

JCT Investment Counsel, dba Alpha Asset Management

FORM ADV, PART 3 – CLIENT RELATIONSHIP SUMMARY **Effective March 11, 2025**

JCT Investment Counsel, Inc. (“JCT,” “we” or the “Firm”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services differ and it is important for the retail investor to understand the differences. Free and simple tools are available for you to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

The Firm provides investment advisory services that are primarily in the form of money management services to individuals, including high net worth individuals, businesses, retirement plans, trusts, estates and charitable organizations. Investment portfolios consist of publicly traded securities, including equities, government, corporate and municipal debt securities, certificates of deposit, mutual funds, exchange-traded funds and options. The Firm has discretionary authority with respect to these money management services. This means that we are granted authority to make trades in client accounts without obtaining the client’s consent prior to trading. There is a \$250,000 minimum account size requirement, which may be waived at the discretion of the Firm.

The Firm also serves as an adviser to a wrap fee program that is made available to clients of its affiliated broker-dealer, American Heritage Securities, Inc. (“AHS”). This wrap fee program, known as the Private Investment Management program (“PIM Program”), is made available by the AHS custodian, Wells Fargo Clearing LLC (“WFC”). Under the PIM Program, clients receive money management, brokerage and custodial services and are charged a wrap program fee that is described below. PIM Program client accounts are also managed by JCT on a discretionary basis. The minimum relationship size to establish a PIM Program account is \$50,000 and the minimum PIM Program account size is \$50,000. Exceptions to these minimum requirements may be made at the Firm’s discretion.

The money management services referenced above include the selection of securities for client investment portfolios and the ongoing monitoring and management of client accounts. These services also include a formal review that is conducted with clients no less frequently than annually.

In addition, the Firm provides retirement plan services to sponsors of participant-directed retirement plans. EGI provides the plan sponsors with advice relative to choices of investment alternatives available to plan participants. These services are provided on a non-discretionary basis.

A full description of our investment advisory services can be found in the Firm’s disclosure brochure, which is prepared in accordance with SEC Form ADV, Part 2A (the “Brochure”). The Brochure is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Questions you may want to discuss with your financial professional

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?

The Firm charges fees for its money management services that are based upon a percentage of assets under management. Please see the Firm’s Brochure for the specific fee schedules that apply with respect to these services. Money management fees are negotiable. Please see the information below regarding the all-inclusive fee that is charged to participants in the PIM Program. Fees paid to JCT are separate and distinct from the fees and expenses charged by mutual funds and exchange-traded funds to their shareholders.

The Firm’s fees for retirement plan services are based upon a percentage of each plan sponsor’s retirement plan assets under management. Fees for retirement plan services are negotiable dependent upon investment strategies and requirements, among other factors, and are subject to a minimum annual fee of \$5,000. Please see the Firm’s Brochure for details.

Under the PIM Program referenced above, clients receive money management, brokerage and custodial services for a single, all-inclusive fee that varies depending upon the account assets under management. This all-inclusive fee will include most transaction costs and fees for the custodian of your assets and, therefore, may be higher than a typical asset-based advisory fee.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Fees and costs related to our investment advisory services are more particularly described in the Firm's Brochure.

The impact of fees and costs on investments

We are prepared to address the following regarding fees and costs:

- Help me understand how these fees and costs might affect my investments.
- If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. For example, in an investment advisory account, there is an incentive to boost assets under management, to increase management fees. You should understand and ask us about these conflicts because they can affect the investment advice that we provide to you.

How might your conflicts of interest affect me, and how will you address them?

The more assets that are in your managed advisory account, the more you will pay in fees. The Firm may therefore have an incentive to encourage you to increase the assets in your account. As a registered investment adviser, and as a fiduciary to our clients, we place our clients' interests first and foremost and are required to make full and fair disclosure of all material facts pertaining to potential or actual conflicts of interest. For more information regarding how the Firm addresses conflicts of interest, please see the Firm Brochure.

How do your financial professionals make money?

Our financial professionals receive a percentage of the investment advisory fees that the Firm earns from their provision of investment advisory services.

Do you or your financial professionals have a legal or disciplinary history?

No. You may visit Investor.gov/CRS, which provides a free and simple search tool to research the Firm and its financial professionals. You should feel free to ask your financial professional the following questions regarding disciplinary history:

- As a financial professional, do you have any disciplinary history?
- For what type of conduct?

Additional information

Additional information about the Firm can be obtained by (i) going to adviserinfo.sec.gov, or (ii) contacting the Firm by telephone at 330-374-7500.

Contact Person

Who is my primary contact person? Is he or she a representative of JCT? Who can I talk to if I have concerns about how this person is treating me?

Jeffrey C. Thomas