ccmi CREATIVE CAPITAL management incorporated

Because money doesn't come with instructions.℠

Peggy Eddy, CFP®
Robert C. Eddy, CFP®
Brian W. Matter, CFP®
Matthew B. Showley, CFP®

Introducing Creative Capital Management Incorporated

Since 1975, we have focused on helping to enhance our clients' financial peace of mind. In 1980, we incorporated the firm, Creative Capital Management, Incorporated ("CCMI"), which provides financial and investment advisory services on a fee-only basis. We work with high net worth individuals, professionals, and owners of closely held businesses, retirement plans, and families in business addressing all aspects of their financial well-being. On a referral basis, we also work with individuals who have specific financial concerns, primarily in the areas of estate planning/estate settlement, tax planning, divorce settlements, inheritance, succession planning, retirement planning, and money management.

Approximately twenty-five percent of our time is spent working with clients on an hourly fee basis, which includes the various areas of financial planning. The remaining balance of our time is spent researching appropriate investment vehicles for the portfolios we supervise, reviewing clients' investment objectives, formulating written investment policies for clients, reviewing and reporting on investment results, and monitoring portfolios on a continual basis. All of these services are provided on a fee-only basis.

In providing financial advice on an hourly fee basis, CCMI offers clients a wide range of services, from tax planning to advice on selling a business, from retirement planning and sound retirement funding strategies to preparing clients to meet with an estate-planning attorney regarding wills and trusts, from break-even analysis to cash flow projections, and from management succession to equity-sharing arrangements for a family business, to mention a few. All of the services pertain to the financial health of CCMI clients and are customized to each client's particular financial situation. Once an initial financial plan or analysis is completed, clients may opt for periodic reviews of their financial status. These reviews are normally provided on an hourly fee basis.

In the investment management service area, we manage clients' funds with long-term results in mind rather than short-term profits. The firm's investment professionals primarily utilize no-load mutual funds, Exchange Traded Funds (ETF's) government securities, real estate investment trusts, bonds, and bank instruments. Each portfolio is designed to meet each client's personal investment objectives.

CCMI offers personalized and responsive services to our clients. In addition, we subscribe to a written code of ethics that outlines standards of ethical conduct that govern our firm and all of its employees. Our code of ethics reflects the fiduciary standard under which we operate our firm in that above all else*, we always put the clients' interests first*.

Throughout the forty years we have been in business, we have seen clients make tremendous strides towards financial independence and greater financial peace of mind.

Clients who have reached their financial objectives with our help appear to have the following common traits:

1. They understand what money can and cannot do and have reasonable expectations of their investable dollars.
2. They set reasonable, attainable goals and implement strategies by which to reach them.
3. They invest for the long-term.
4. They call with questions as they occur and are not hesitant about admitting that they do not know all things financial.
5. They discipline themselves in spending and keep debt to a minimum.
6. They know by December of each year what their current estimated taxes are so adequate planning can take place.
7. They are concerned about their families and other heirs and take care of estate planning matters with little delay. They also train their children to be financially literate and fiscally responsible.
8. They are open to new ideas and are willing to pay for expert advice from professional advisors.
9. They are adequately insured.
10. They take responsibility for their financial decisions after reviewing the various alternatives we provide to them.
11. They periodically review their financial progress and track their improvement with our help.
12. They know that happiness in life does not come from having a high net worth; rather, they know happiness is based on having a balanced life, a minimum of financial worries, and taking joy in each day.

We feel fortunate to be associated with the fine clients with whom we work. We welcome you as a client and look forward to assisting you to attain greater financial peace of mind!

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Creative Capital Management Incorporated
Firm Brochure

Thank you for selecting Creative Capital Management, Incorporated as your financial advisory firm.

We feel it is important that you understand who we are, the services we provide, how we provide them, and how we are compensated. We hope you will find the attached information helpful.

As our firm is a Registered Investment Advisor with the United States Securities and Exchange Commission, there are several compliance areas in which we will need your assistance. One of these is to ask you to read over the attached firm brochure/disclosure statement, additional supplement, and our privacy policy and acknowledge that you have received, read, and understand the information they each contain. The language that follows in the attached material and disclosure language is at times rather formal; however, to comply with regulations, we must provide you with the information in this format. You will find our normal correspondence to be much more "reader-friendly." We appreciate your understanding in this regard and, of course, welcome any questions you may have about the information provided.

Our firm's reputation has been built on trust *and, as fiduciaries, we always put the client's best interests first. We believe this is the right and only way to conduct our business.* We have worked diligently to earn our clients' confidence. We want you to feel completely comfortable with the information presented herein, so that a mutually beneficial relationship will result from our association. If you have any questions regarding our firm, the scope of services provided, or our fees, we encourage you to bring them to our attention at any time.

We look forward to working with you to help enhance your financial future!

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Creative Capital Management Incorporated
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SEC File Number: 801 – 17953

CCMI Firm Brochure

Dated February 12, 2016

This brochure provides information about the qualifications and business practices of Creative Capital Management Incorporated (CCMI). If you have any questions about the contents of this brochure, please contact us at (619) 298-3993 or peg@myccmi.com. Additional information about Creative Capital Management Incorporated is also available on the SEC's website at www.adviserinfo.sec.gov.

References herein to Creative Capital Management Incorporated as a "registered investment adviser" or any reference being "registered" does not imply a certain level of skill or training.

Item 2 Material Changes

The only change made in the last year has been a recent standardization of investment management fees for all accounts, irrespective of whether the client is a First Step client. A letter was sent to 13 clients in January of 2016 informing them of this change and that the standard fee will apply starting with first quarter reports to be sent out in April of 2016. Other than this change, there have been no major changes made to Creative Capital Management Incorporated's disclosure statement since the last amendment was filed on 5-19-2015 If applicable, clients will receive a summary of any material changes to this and future Brochures within 120 days of the end of the CCMI business fiscal year which currently is December 31.

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Item 4 Advisory Business

A. Creative Capital Management Incorporated "CCMI" is a corporation formed on May 1, 1980 in the state of California. CCMI became registered as an Investment Adviser Firm on November 25, 1982. CCMI is principally owned by Margaret Eddy and Robert Eddy. Margaret Eddy and Robert Eddy are the CCMI's President and Chief Financial Officer, respectively.

B. As discussed below, CCMI offers to its clients (individuals, pension and profit sharing plans, business entities, trusts, and estates) investment advisory services, and, *to the extent specifically requested by a client,* financial planning, and related consulting services.

INVESTMENT ADVISORY SERVICES

The client can determine to engage CCMI to provide discretionary investment advisory services on a *fee-only* basis. We manage our advisory accounts on a discretionary basis. *This means that we make trades without discussing it with the client beforehand, but use the client's stated objectives to guide our actions*. CCMI does not have the ability to transfer funds into or out of any managed account, as the advisors can only make trades within the account. CCMI's annual investment advisory fee is based upon a percentage (%) of the market value of the assets placed under the Registrant's management.

The current annual fee for CCMI investment advisory services is billed in quarterly installments based on the average daily balance of the portfolio per quarter as follows:

1.0% of liquid assets valued between $0 and $1 million
.80% of liquid assets valued between $1,000,001 and $2 million
.60% of liquid assets valued between $2,000,001 and $3 million
.40% of liquid assets in excess of $3 million

Unless authorized to be debited directly from the client's account, investment advisory fees are due within ten days of receipt of the invoice and are non-negotiable. Any changes to this fee schedule will be sent to clients at least thirty days in advance.

When a managed portfolio is established, the first quarterly investment advisory fee will be billed at the end of the first quarter and will be prorated for the time the funds were under CCMI direction based on the average daily balance during the quarter. CCMI reserves the right to charge a portfolio setup fee.

The ideal minimum portfolio size at CCMI is $500,000; however, depending on the relationship the client or their family has with the firm, smaller portfolios can be accommodated on a specialized basis.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent requested by a client, CCMI *may* determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, tax planning, insurance planning, etc.) on a stand-alone separate fee basis. CCMI's planning and consulting fees are negotiable, but generally range from $2,500 to $15,000,

depending on the number of hours involved. Hourly fees range from $150 to $300, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s). Prior to engaging CCMI to provide planning or consulting services, clients are required to enter into a *Financial Planning and Consulting Agreement* with CCMI setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to CCMI commencing services. Neither CCMI, nor any of its representatives, serves as an attorney, accountant, or licensed insurance agent, and no portion of CCMI's services should be construed as same. CCMI may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from CCMI. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client's responsibility to promptly notify CCMI if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising CCMI's previous recommendations and/or services.

FINANCIAL PLANNING PROCESS

Before our initial meeting with a client, CCMI normally has sufficient time to provide the client with an outline of the financial information and documents that will be needed for the first appointment. In order to introduce CCMI to the client, review the client's personal financial or business planning needs, and determine the scope of services the client desires, this first appointment usually takes approximately one hour, for which there may be no charge. Thereafter, CCMI's normal hourly fee applies.

Prior to initiating any financial planning services for the client, in follow-up correspondence CCMI will summarize the financial concerns discussed in the meeting... At this time, CCMI will also provide the best estimate of the time involved to address these concerns, and request an initial retainer fee from the client. An outline of any additional data needed for the analysis will also be included in the follow-up correspondence. Upon receipt of all of the additional data or information requested and the retainer fee, CCMI will begin the work for the client's benefit. Once the plan or project is completed, the client will receive a final invoice detailing the work done by members of the CCMI team and the balance of the fee due.

Once CCMI has completed a preliminary summary focusing on the financial objectives, financial data and assumptions and priorities the client develops and verifies with CCMI's input, an initial draft of CCMI's written plan with supporting documentation and recommendations is presented for the client's review. CCMI asks the client to review the draft of the report, making note of questions or comments that will be reviewed at a follow-up meeting. The client is free to implement any or all of CCMI's recommendations that will be summarized on a detailed implementation schedule for easy reference purposes. The financial planning engagement is considered completed when the final written plan and implementation schedule are finalized and the client reviews the plan with CCMI. Assistance with implementation items is available upon request on an hourly fee basis.

Clients are encouraged to periodically review their financial progress. Upon client request, CCMI provides financial planning reviews that might target a specific concern or provide a general reassessment of the client's overall financial progress. These reviews are also provided on a fee-only basis.

All of the planning services are based on information provided by the client. This data is kept confidential and is shared with third parties only as required by law or with prior client consent. This includes situations when client information must be disclosed during examinations performed by the Securities and Exchange Commission. At times, CCMI may need to consult with the client's other advisors, such as an attorney, CPA, trust officer, or insurance agent. It is helpful to have access to members of the client's professional advisory team and, as such, CCMI will ask for either verbal or written permission from the client to do so.

Miscellaneous financial advice is also available on an hourly fee basis. Reviewing areas such as mortgage options, tax planning, or financial concerns of a limited scope come under this general heading and can be provided on an hourly fee basis.

FIRST STEP **FINANCIAL PLANNING SERVICES**

First Step Financial Plan

In addition to our traditional financial planning services, we have a First Step Financial Plan offering, suitable for clients with less complex financial lives, also provided on a fee-only basis. Generally, this offering is best suited for clients who have not yet acquired a high level of wealth and are interested in financial planning for the first time. The CCMI First Step Financial Plan process provides personalized solutions and recommendations based on a client's particular financial concerns; thus, for these clients, we will need to review the aforementioned financial information.

The First Step Financial Plan process does not necessarily require an initial meeting with the client. Most, if not all, of the communication can be handled via letters, email, and telephone calls. However, we may make ourselves available for an initial appointment on an as-needed basis. There may be no charge for an initial appointment (if one is conducted) or for an initial telephone appointment.

A First Step Financial Plan is considered complete when the client reviews the plan with a CCMI team member, unless the client opts out of this step in the process. If appropriate, amendments may be made to the initial draft of the plan following the review meeting with the client, for which there may be an additional charge. Assistance in completing items from the implementation schedule that accompanied the First Step Financial Plan is available on an hourly fee basis.

Clients are encouraged to periodically review their financial progress. Upon client request, we provide First Step Financial Plan reviews that might target a specific concern, or provide a general assessment of the client's overall financial progress. These reviews are also provided on a fee-only basis.

First Step Financial Plan Fees

The fee for a First Step Financial Plan ranges from $2,000 to $3,500, and an initial retainer will be requested from the client before any work is performed for the client's benefit. The remainder of the fee will be billed upon completion of the plan. The fee includes time spent in a meeting with a CCMI team member, reviewing the recommendations and possible alternative solutions and reviewing the completed planning work. The client may choose not to have a review meeting conducted; however, the fee, as stated in preliminary correspondence with the client, will still be charged.

MISCELLANEOUS

Non-Investment Consulting/Implementation Services. *To the extent requested by the client,* CCMI *may* provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, college funding planning etc. Neither CCMI, nor any of its representatives, serves as an attorney, accountant, or licensed insurance agent, and no portion of CCMI's services should be construed as same. *To the extent requested by a client,* CCMI may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance agents, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from CCMI. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client's responsibility to promptly notify CCMI if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising CCMI's previous recommendations and/or services.

Please Note: Cash Positions. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being **no guarantee** that such anticipated market conditions/events will occur), CCMI may maintain cash positions for tactical purposes or as a reserve. Although currently CCMI is not billing for cash in money market accounts, at some future date, all cash positions (money markets, etc.) *can* be included as part of assets under management for purposes of calculating CCMI's advisory fee.

Independent Managers. CCMI may allocate a portion of the client's assets among certain independent investment manager[s] (the "*Independent Manager[s]*"), consistent with the stated investment objectives of the client. CCMI shall continue to render advisory services to the client relative to the ongoing monitoring and reviewing of account performance, for which Registrant shall receive an annual advisory fee which is based upon a percentage of the market value of the assets being managed by the designated *Independent Manager[s]*. Factors which the Registrant shall consider in allocating client assets among *Independent Manager[s]* include the client's stated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research. The investment management fees charged by the designated *Independent Manager[s]*, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are exclusive of, and in addition to,

CCMI's investment advisory fee set forth above.

Client Obligations. In performing its services, CCMI shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify CCMI if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising CCMI's previous recommendations and/or services.

Disclosure Statement. A copy of CCMI's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the *Investment Advisory Agreement or Financial Planning and Consulting Agreement*. Any client who has not received a copy of CCMI's written Brochure at least 48 hours prior to executing the *Investment Advisory Agreement or Financial Planning and Consulting Agreement* shall have five business days subsequent to executing the agreement to terminate CCMI's services without penalty.

C. CCMI shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, CCMI shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on CCMI's services.

D. CCMI does not participate in a wrap fee program.

E. As of December 31, 2015, CCMI had $ $278,799,852 in assets under management on a discretionary basis.

Item 5 Fees and Compensation

Please refer to pages 3 to 6, found in the previous section, Item 4 Advisory Business, for a complete overview of CCMI's fees by service.

A. Clients may elect to have CCMI's advisory fees deducted from their custodial account. Both CCMI's *Investment Advisory Agreement* and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of CCMI's investment advisory fee and to directly remit that management fee to CCMI in compliance with regulatory procedures. In the limited event that CCMI bills the client directly, payment is due upon receipt of CCMI's invoice. CCMI shall deduct fees and/or bill clients quarterly in arrears, based upon the average daily market value of the assets on the last business day of the previous quarter.

B. As discussed below, unless the client directs otherwise or an individual client's circumstances require, CCMI shall generally recommend that Charles Schwab and Co., Inc. ("*Schwab")* serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* charge brokerage commissions and/or transaction fees for effecting certain securities transactions

(e.g. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition to CCMI's investment management fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

C. CCMI's annual investment advisory fee shall be prorated and paid quarterly, in arrears, based upon the market value of the assets on the average daily balance of the portfolio during the previous quarter. If an independent manager is used, the investment management fees for the independent managers will be billed quarterly, either in advance of the quarter or in arrears, depending on the billing procedure of the independent manager. CCMI generally requires an annual minimum fee of $5,000. I. However, CCMI, in its sole discretion, may charge a lesser investment management fee and/or waive or reduce its minimum fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

   The *Investment Advisory Agreement* between CCMI and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, CCMI shall debit the account for the pro-rated portion of the unpaid advanced advisory fee based upon the number of days that services were provided during the billing quarter.

D. Neither CCMI, nor its representatives accept compensation from the sale of securities or other investment products. CCMI is strictly a fee only firm.

Item 6 Performance-Based Fees and Side-by-Side Management

Neither CCMI nor any supervised person of CCMI accepts performance-based fees.

Item 7 Types of Clients

CCMI's clients generally include individuals, pension and profit sharing plans, business entities, trusts, and estates. CCMI generally requires an annual minimum investment advisory fee of $5,000. CCMI, in its sole discretion, may charge a lesser investment management fee and/or waive or reduce its minimum fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

A. CCMI may utilize the following methods of security analysis:
   - Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)

- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

CCMI may utilize the following investment strategies when implementing investment advice given to clients:

- Long-Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Periodically rebalancing a portfolio due to a major change in economic conditions or a change in asset classes selected by the CCMI advisors

Please Note: Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by CCMI) will be profitable or equal any specific performance level(s).

B. CCMI's methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis CCMI must have access to current/new market information. CCMI has no control over the dissemination rate of market information; therefore, unbeknownst to CCMI, certain analyses may be compiled with outdated market information, severely limiting the value of CCMI's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

CCMI's primary investment strategy – The investment advisors at CCMI believe that investing is done for the long-term. However, every investment strategy has its own inherent risks and limitations. For example, longer-term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter-term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer-term investment strategy.

C. Currently, CCMI primarily allocates client investment assets among various no-load mutual funds, fixed income securities, exchange traded funds ("ETFs"), individual securities if warranted, and REITS on a discretionary basis in accordance with the client's designated investment objective(s).

Item 9 Disciplinary Information

CCMI has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

A. Neither CCMI, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

B. Neither CCMI, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

C. CCMI has no other relationship or arrangement with a related person that is material to its advisory business.

D. CCMI does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients. CCMI receives only fees from its clients.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. CCMI maintains an investment policy relative to personal securities transactions. This investment policy is part of CCMI's overall Code of Ethics, which serves to establish a standard of business conduct for all of CCMI's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

   In accordance with Section 204A of the Investment Advisers Act of 1940, CCMI also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by CCMI or any person associated with CCMI.

B. Neither CCMI nor any related person of CCMI recommends, buys, or sells for client accounts, securities in which CCMI or any related person of CCMI has a material financial interest.

C. CCMI and/or representatives of CCMI *may* buy or sell securities that are also recommended to clients. This practice may create a situation where CCMI and/or representatives of CCMI are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if CCMI did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of CCMI's clients) and other potentially abusive practices.

   CCMI has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of CCMI's "Access Persons". CCMI's securities transaction policy requires that an Access Person of CCMI must provide the Chief Compliance Officer or his/her designee with a written

report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date CCMI selects; provided, however that at any time that CCMI has only one Access Person, he or she shall not be required to submit any securities report described above.

D. CCMI and/or representatives of CCMI **may** buy or sell securities, at or around the same time as those securities are recommended to clients. This practice may create a situation where CCMI and/or representatives of CCMI are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11 C, CCMI has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of CCMI's Access Persons.

Item 12 Brokerage Practices

A. In the event that the client requests that CCMI recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct CCMI to use a specific broker-dealer/custodian), CCMI generally recommends that investment management accounts be maintained at Schwab. Prior to engaging CCMI to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with CCMI setting forth the terms and conditions under which CCMI shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that CCMI considers in recommending *Schwab* (or any other broker-dealer/custodian to clients) include historical relationship with CCMI, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by CCMI's clients shall comply with CCMI's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where CCMI determines, in good faith, that the commission/transaction fee is reasonable. The determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although CCMI will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, CCMI's investment management fee. CCMI's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

1. Research and Additional Benefits
   Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-

dealer/custodian, CCMI may receive from *Schwab* (or another broker-dealer/custodian) without cost (and/or at a discount) support services and/or products, certain of which assist CCMI to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by CCMI may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by CCMI in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist CCMI in managing and administering client accounts. Others do not directly provide such assistance, but rather assist CCMI to manage and further develop its business enterprise.

CCMI's clients do not pay more for investment transactions effected and/or assets maintained at *Schwab* as a result of this arrangement. There is no corresponding commitment made by CCMI to *Schwab* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

CCMI's Chief Compliance Officer, Margaret F. Eddy, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.

2. CCMI does not receive referrals from broker-dealers.

3. CCMI does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and CCMI will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by CCMI. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

   Please Note: In the event that the client directs CCMI to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through CCMI.

CCMI's Chief Compliance Officer, Margaret F. Eddy, remains available to address any questions that a client or prospective client may have regarding the above arrangement.

B. To the extent that CCMI provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless CCMI decides to purchase or sell the same securities for several clients at approximately the same time. CCMI may (but is not obligated to) combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among CCMI's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. CCMI shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 Review of Accounts

A. For those clients to whom CCMI provides investment supervisory services, account reviews are conducted on an ongoing basis by CCMI's Principals and/or representatives. All investment supervisory clients are advised that it remains their responsibility to advise CCMI of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with CCMI on an annual basis.

B. CCMI ***may*** conduct account reviews on other periodically, as a result of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. CCMI may also provide a written periodic report summarizing account activity and performance.

Item 14 Client Referrals and Other Compensation

A. As referenced in Item 12.A.1 above, CCMI may receive an indirect economic benefit from *Schwab*. CCMI, without cost (and/or at a discount), may receive support services and/or products from *Schwab*.

CCMI's clients do not pay more for investment transactions effected and/or assets maintained at *Schwab* as a result of this arrangement. There is no corresponding commitment made by CCMI to *Schwab* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

CCMI's Chief Compliance Officer, Margaret F. Eddy, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest any such arrangement may create.

B. Neither CCMI nor its representatives compensate non-supervised persons for client referrals.

Item 15 Custody

CCMI shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. CCMI may also provide a written periodic report summarizing account activity and performance.

Please Note*:** To the extent that CCMI provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by CCMI with the account statements received from the account custodian. ***Please Also Note: The account custodian does not verify the accuracy of CCMI's advisory fee calculation.

Please Also Note: Custody Situations: CCMI engages in other practices and/or services on behalf of its clients that require disclosure at the Custody section of Part 1 of Form ADV, which practices and/or services are subject to an annual surprise CPA examination in accordance with the requirements of Rule 206(4)-2 under the Investment Advisers Act of 1940.

CCMI's Chief Compliance Officer remains available to address any questions that a client or prospective client may have regarding custody-related issues.

Item 16 Investment Discretion

The client can determine to engage CCMI to provide investment advisory services on a discretionary basis. Prior to CCMI assuming discretionary authority over a client's account, the client shall be required to execute an *Investment Advisory Agreement*, naming CCMI as the client's attorney and agent in fact, granting CCMI full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage CCMI on a discretionary basis may, at any time, impose restrictions, ***in writing***, on CCMI's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe CCMI's use of margin, etc.).

Item 17 Voting Client Securities

A. CCMI does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact CCMI to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

A. CCMI does not solicit fees of more than $1,200, per client, six months or more in advance of providing services.

B. CCMI is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

C. CCMI has not been the subject of a bankruptcy petition.

***ANY QUESTIONS**: CCMI's Chief Compliance Officer, Margaret F. Eddy, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.*

Creative Capital Management Incorporated
8880 Rio San Diego Drive, Suite 1150 • San Diego, California 92108
(800) 615-6666 • www.myccmi.com
SEC File Number: 801 – 17953

CCMI Firm Brochure Supplement

Dated February 12, 2016

Advisory Team Members
Margaret F. Eddy, CFP®, Robert C. Eddy, CFP®,
Matthew B. Showley, CFP®, and Brian W. Matter, CFP®

Education and Business Standards

Creative Capital Management, Inc. requires that any employee whose function involves determining or giving investment advice to clients must be a graduate of a four year college and must:

- Have a minimum of three years prior financial planning, investment advisory experience, or business consulting experience;
- Pass the CFP examination within three years of employment;
- Complete a minimum of forty (40) hours of continuing education during each calendar year;
- Attend the firm's monthly investment management meetings;
- Stay current with professional reading, research, and other forms of pertinent information that relate to CCMI clients' portfolios and financial planning strategies; and
- Comply with our firm's code of ethics, which states that we have a fiduciary duty to always place the interests of the clients ahead of our own interests and that of the firm.

Professional Certifications

Advisory employees have earned the CFP® certification. Let us explain that in further detail:

CERTIFIED FINANCIAL PLANNER™
CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary certification; no federal of state law or regulation requires financial planners to hold a CFP® certification.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interest of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Margaret F. Eddy "Peggy", CFP®, President and Chief Compliance Officer

Educational Background:
Peggy was born to a career Army officer and his wife in Washington D.C. on 12/31/46. She graduated from Wheaton College in Norton, Massachusetts and received a Bachelor of Arts degree in1968.

Business Experience:
Following her graduation from college in 1968, Peggy was employed by the Placement Department at San Jose State College (now San Jose State University) as the placement counselor for liberal arts graduates. A year later, she was hired by Lendman Associates as one of two female associates throughout the country who worked with junior military officers, placing these candidates in career positions with Fortune 500 companies.

Following two years with Lendman Associates, Peggy became a partner at Career Services, a military placement agency in Coronado, California. A short time thereafter, she became Secretary/Treasurer of the corporation and continued placing junior officers in civilian careers.

Following her marriage in August of 1974 to Bob Eddy, she worked with Bob to establish their fee-only financial and investment advisory firm in January of 1975. She is President and Chief Compliance Officer of CCMI. She is also in charge of business development for the firm. About 35% of her time is spent providing financial planning services to clients, including follow-up on their implementation schedules, and 40% of her time is spent in the investment advisory area of the firm. The remainder of her time is spent on marketing and compliance matters.

Peggy has been a CERTIFIED FINANCIAL PLANNER™ practitioner since 1983 and is a member of the national and local chapters of the Financial Planning Association and the National Association of Personal Financial Advisors. She was the recipient of the Small Business Administration's District and Regional Women in Business Advocate Award in 1988. In 1991, Peggy founded the San Diego Chapter of the National Association of Women Business Owners (NAWBO), and served as its first President. In 1992, she initiated the Family Business Forum at the University of San Diego, dedicated to the continuity of family businesses. In addition, Peggy belongs to San Diego Social Venture Partners, and is an active member of the Rotary Club of San Diego. Currently, Peggy serves on the Board of Directors of the Lightbridge Hospice Community Foundation and is a member of the Board of Directors of San Diego Rotary Club 33.

In October 1994, Peggy was honored as one of thirty-four "San Diego Women Who Mean Business" as the inaugural award winner for the financial services category. In October of 2001, Peggy again received this award. In July of 2003, Peggy received the Woman Business Owner of the Year Award from NAWBO, San Diego. She is currently a financial columnist for the *San Diego Daily Transcript* and has written for financial websites for women. She also has contributed to several national publications. In her spare time, Peg enjoys gardening and creative writing.

Disciplinary Information:
None

Other Professional Activities:
Financial Planning Association National and San Diego Chapters (Member), National Association of Personal Financial Advisors (Member), San Diego Social Venture Partners (Member), Lightbridge Hospice Foundation (Board member), San Diego Estate Planning Council (Member Emeritus), Rotary Club 33 of San Diego (Member and Board member)

Additional Compensation:
Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI, its principals, and employees. No commissions or additional compensation of any kind is generated or accepted**.**

Supervision:
Margaret Eddy's compliance related activities are supervised by Robert Eddy, Chief Financial Officer. He reviews Margaret's investment advisory work through frequent office interactions.

Margaret Eddy's Contact Information:
(619) 298-3993 1• peg@myccmi.com

Robert C. Eddy "Bob", CFP®, Chief Financial Officer

Educational Background:
Bob was born to a career Naval Officer and his wife at Bethesda Maryland on 4/26/47. Bob graduated from Drexel University with a Bachelor of Science in Commerce and Engineering with a Major in Finance in 1970.

Business Experience:
Following his college graduation, Bob entered the U.S. Marine Corps as a Second Lieutenant assigned to an Engineer Battalion. In addition to his time overseas, he served at Camp Pendleton from 1970 to 1973.

Upon his discharge from the United States Marine Corps, Bob was hired by Ingersoll Rand and worked there until November of 1974, when he and his wife/business partner, Peg Eddy, began to plan their own financial services business. Bob officially began the business in January of 1975 and specializes in providing fee-only financial advice and investment advisory services. Bob is the Chief Financial Officer of CCMI and is responsible for the daily operations of the firm. In addition, Bob is involved in the investment management area of the practice and spends approximately 70% of his time in this area and 25% is spent providing financial planning services to clients. The balance of his time is spent in taking care of the daily operations, training new team members and financial reporting for the firm.

Bob has been a CERTIFIED FINANCIAL PLANNER™ practitioner since 1983. In 1996, the Institute of Wealth Management certified Bob as an Accredited Asset Management Specialist, and in 1997 he was also certified as a Chartered Mutual Fund Counselor. Bob is a member of the national and local Financial Planning Association chapters and the National Association of Personal Financial Advisors. Bob served as Treasurer and Ethics Chairman for the San Diego Chapter of the International Association for Financial Planning. Additionally, Bob is a member of San Diego Social Venture Partners.

When his sons were in primary and junior high school, Bob volunteered his spare time as a coach for the American Youth Soccer Organization. In addition, he has been active in Cub Scouts, supported high school athletics, and chaired the Granite Hills High School Safe Graduation Night project for three years. In his spare time, Bob enjoys playing golf and taking guitar lessons.

Disciplinary Information:
None

Other Professional Activities:
Financial Planning Association National and San Diego Chapters (Member), National Association of Personal Financial Advisors (Member), San Diego Social Venture Partners (Member)

Additional Compensation:
Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI, its principals, and employees. No commissions or additional compensation of any kind is generated or accepted**.**

Supervision:
Robert Eddy's compliance related activities are supervised by Margaret Eddy, Chief Compliance Officer. She reviews Robert's investment advisory work through frequent office interactions.

Robert Eddy's Contact Information:
(619) 298-3993 x2 • bob@myccmi.com

Matthew B. Showley "Matt", CFP®, Associate Financial Advisor

Educational Background:
Matt was born on 6/3/80. He graduated from Francis Parker High School in 1998. Matt graduated from Pepperdine University with a Bachelor of Science in Business Administration in 2002. In 2006, he earned his Masters of Business Administration (MBA) in Finance and Real Estate from the University of San Diego. Matt also earned his graduate certificate in Financial and Tax Planning from San Diego State University in 2008.

Business Experience:
Prior to joining the CCMI team, Matt spent three years as a Financial Reporting Assistant with Science Applications International Corporation (SAIC) in San Diego. Prior to choosing the financial services industry for a career, Matt was a Front Office Supervisor at the La Jolla Beach and Tennis Club for two years.

CCMI welcomed Matt to the team in 2006 as an Investment Management Associate. Since that time, Matt has become an Associate of the firm, working in both the investment management and financial planning areas. He has significantly streamlined the CCMI investment management processes and implemented several new planning strategies as the lead investment professional for the firm's First Step Financial Plan.

Matt earned his official CERTIFIED FINANCIAL PLANNER™ designation in June 2009 and is a member of the national and local chapters of the Financial Planning Association and the

National Association of Personal Financial Advisors. Matt also serves on the Francis Parker Alumni Council and Empower Charter School board. Additionally, Matt is a member of the Estate Planning Council of San Diego, The Business Network and is a graduate of LEAD San Diego.

In the past, Matt has spent time volunteering with March of Dimes and I Love a Clean San Diego. In his spare time, he enjoys playing volleyball, golf, and relaxing with his wife, Alex. Together, Matt and Alex like to travel, cook, and spend time with their young children, Elizabeth and Jacob.

Disciplinary Information:
None

Other Professional Activities:
Financial Planning Association National and San Diego Chapters (Member), National Association of Personal Financial Advisors (Member), "NexGen" (Member), Francis Parker Alumni Council (Member), Estate Planning Council of San Diego (Member),Board Member and Treasurer for Empower Charter School, LEAD San Diego Graduate

Additional Compensation:
Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI, its principals, and employees. No commissions or additional compensation of any kind is generated or accepted**.**

Supervision:
Matthew Showley is supervised by Margaret Eddy, President and Chief Compliance Officer and Robert Eddy, Chief Financial Officer. They review Matthew's investment advisory work through frequent office interactions.

Matthew Showley's Contact Information:
(619) 298-3993 x3 • matt@myccmi.com

Brian W. Matter, CFP®. Associate Financial Advisor

Educational Background:
Brian was born on 7/2/79. He attended Brigham Young University and graduated with a Bachelor of Science in Business Management in 2001. Brian also completed the CFP® Certification Professional Education Program from the College for Financial Planning in 2009.

Business Experience:
Following his graduation, Brian accepted a position with Ernst & Young LLP and achieved the rank of Senior Manager in Advisory Services. During his eight years at Ernst & Young, he helped to manage a team in the San Diego office and served clients ranging from small startups to Fortune 500 corporations in a variety of industries.

Brian successfully completed the CERTIFIED FINANCIAL PLANNER™ curriculum and passed the comprehensive examination in March 2010, prior to joining CCMI in June of

2010. Brian received his CFP® designation in September of 2012. He is a member of the national and local chapters of the Financial Planning Association and a member of National Association of Personal Financial Advisors. Brian actively works with clients in both the financial planning and investment management services.

In his spare time, Brian enjoys spending time with his wife Nikki, his daughter Emma, and his sons Kainoa and Kekoa. He also enjoys traveling the world, volunteering, surfing and competing in sports.

Disciplinary Information:
None

Other Professional Activities:
Financial Planning Association National and San Diego Chapters (Member), BYU Management Society San Diego Chapter (Board member*);* San Diego Downtown Breakfast Rotary Club (Board Member); National Association of Personal Financial Advisors; LEAD San Diego Graduate (2014); Reality Changers Major Corporate Action Team Member

Additional Compensation:
Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI, its principals, and employees. No commissions or additional compensation of any kind is generated or accepted**.**

Supervision:
Brian Matter is supervised by Margaret Eddy, President and Chief Compliance Officer and Robert Eddy, Chief Financial Officer. They review Brian's investment advisory work through frequent office interactions.

Brian Matter's Contact Information:
(619) 298-3993 x4 • brian@myccmi.com

This brochure supplement provides information about Margaret F. Eddy, CFP®, Robert C. Eddy, CFP®, Matthew B. Showley, CFP®, and Brian W. Matter, CFP®, which supplements the Creative Capital Management, Inc. firm brochure. You should have received a copy of that brochure. Please contact Margaret Eddy, Chief Compliance Officer, if you did not receive Creative Capital Management, Inc.'s brochure or if you have any questions about the contents of this supplement.

Client Acknowledgement Form

In signing the last page of this acknowledgement form, the client states that he/she has received and reviewed the CCMI privacy policy, firm brochure, and brochure supplement and that he/she understands the scope of services to be provided and the fees that will be incurred. In addition, the client acknowledges with his/her signature that information has been provided and read by the client on the background of the financial planners and investment advisors at CCMI and, further, that no financial or investment results are guaranteed either by CCMI or its staff.

Acknowledgement:

I understand that Creative Capital Management, Inc., (hereinafter "CCMI") is a Registered Investment Advisor and that four of its personnel, Robert C. Eddy, Margaret F. Eddy, Matthew B. Showley and Brian Matter are Advisory Team Members and CERTIFIED FINANCIAL PLANNER™ professionals; I also understand that various advisory services for a fee are provided by CCMI.

Having read the information provided, I/we understand the following:

- That any financial and/or tax advice is based on information which I/we will provide; therefore, CCMI and its advisors are not responsible for verification of this information;
- That to enhance the financial planning or investment management process, I agree to fully disclose all matters pertinent to my financial affairs, including, but not limited to, information regarding my financial objectives, expenses, assets, liabilities, investments, insurance, tax and estate planning programs, retirement plans, and any personal matters or changes which may have a bearing on my current or prospective financial status. It is not CCMI's responsibility to discover facts which are not made readily available to CCMI;
- That I am authorizing CCMI to contact my accountants, attorneys, and other consultants as deemed necessary by them and *I will provide the appropriate permission to each of these individuals as needed*. I assume the responsibility to review ***all*** tax and legal implications of CCMI's recommendations with an attorney or an accountant, as is necessary;
- That the employees of CCMI may personally invest in the same mutual funds or securities for their own investment accounts as those of their clients. No employee will invest in any mutual fund or security if he/she has any direct or indirect beneficial interest in any of these transactions. A personal transactions log is maintained for any personal securities transaction of each principal, board member, employee or affiliated person of the firm. These transactions are recorded no later than twenty days after the end of the calendar quarter in which they were effected. The records include the title and amount of the security, the trade date, the nature of the transaction, the price at which the security was effected, and the name of the broker, dealer or bank through whom the transaction was effected. In addition, the employees do not place personal trades in advance of client transactions, nor do they time the market with their own portfolios;
- That CCMI is not qualified to and does not give legal advice, and that I am not relying on CCMI for advice on legal matters;
- That CCMI has investigated the qualifications of its investment professionals and has authorized all such professionals to provide financial advice and give investment advice pursuant to this Disclosure Statement and Agreement;
- That the financial advice provided is based upon CCMI's judgment, and CCMI cannot and does not ensure, guarantee, or make assurances concerning the results of any action recommended;

- That the firm's investment professionals do not provide advice on individual securities, or on rights and warrants to individual securities, except on a limited basis. I also acknowledge that the investment advisors do not vote proxies for the mutual funds which they have selected for my portfolio, or for any individual securities;
- That the investment advisors at CCMI do not take physical custody of any security of any kind. All transmittal of securities and/or cash will be done directly by the client to the custodian or fund manager and not by the investment advisors;
- That I agree CCMI is not responsible for the acts, omissions, or solvency of any broker, agent, independent contractor, or third party who is recommended by CCMI in good faith to take action, provide counsel, negotiate, or to consummate transactions for the benefit of my accounts;
- That I may choose to implement any and all action recommendations with anyone or any service I choose. However, while I am under absolutely no obligation to implement any action or recommendations through CCMI, CCMI may assist me in the areas of mutual funds and bonds, individual stocks, ETFs, REITs, and Government securities by following my direction and relaying said directions to any broker, investment company, bank, or financial institution. I also understand that, again, while I am under no obligation, CCMI may assist me in the implementation of any action or recommendations involving annuities, health, disability, long-term care, and life insurance by directing me to experts in these fields. I also understand that CCMI may assist me in the implementation of any action or recommendations involving investment vehicles that are not securities or insurance products. With respect to any such implementations, CCMI does not assume and in no way undertakes responsibility, supervision, or other obligations in connection with such implementations;
- That in the event I select CCMI to implement any investment decisions, I will retain absolute discretion over all such decisions unless I specifically authorize CCMI to do so, via appropriate limited Power of Attorney or other written authorization. I understand that CCMI has no possession or custody of any client assets or funds. The limited power of attorney exercised by CCMI with client accounts is for the sole purpose of serving client interests in those accounts and gives CCMI no direct or indirect access to client funds for its own use;
- That investments have certain risks and that the advisors at CCMI make no market performance guarantees. Any market losses resulting from the purchase, sale, or exchange of any security or product recommendations by the advisors are normal market risks of which I am aware. I understand that investment risk is modified by long-term participation, as opposed to market timing, and have agreed with CCMI advisors on the long-term approach to my investment objectives;
- That CCMI and its advisors agree to keep all financial information confidential, realizing that there are situations when client information must be disclosed during examinations performed by the Securities and Exchange Commission. In all other cases, however, such confidential information will only be available to authorized employees of CCMI and will only be disclosed to outsiders with my permission. I also acknowledge receipt of the current CCMI privacy policy;
- That the information in this disclosure statement and accompanying materials has not been passed upon or approved by the Securities and Exchange Commission, or by the California Department of Corporations, nor has the Commission or the State passed upon or approved the qualifications or business practices of CCMI or its advisory representatives;
- That I can terminate my relationship with CCMI by means of written notice. Any fees incurred up to that time are due in full;

- That the advisors at CCMI presently utilize the Charles Schwab and Company Investment Management Services and, as such, may recommend clearing trades through an account in my name at Schwab for convenient management and tracking purposes. I also understand that I am not obligated to open an account at Schwab. CCMI does not serve as a registered broker/dealer, underwriter, or sponsor of any products or services. CCMI has no selling agreements with any providers which would create a conflict of interest between their income and my/our best interests;
- That I have read and understood all the information in this outline, including the full description included of the background and experience of each CCMI investment professional who may provide services;
- That the fees I will incur will be detailed and outlined prior to services being performed. I understand that the current CCMI Financial Advisory/Planning hourly fee for a principal is $300, $205/hour for an associate financial advisor, $150 for financial planning support, and $65 for administrative services. I acknowledge that there may be a separate Portfolio Design fee for extraordinary work performed and the annual portfolio management fee will be based on the graduated fee schedule as noted herein. This fee will be billed quarterly at 25% of the applicable annual fee. I also acknowledge that investment management fee increases may occur and that CCMI will provide at least a 30-day notice of any such fee increases.

RESTRICTIONS/OTHER IMPORTANT INFORMATION:

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Please Note: Unless you indicate to the contrary in the spaces provided above, we will assume that there are no restrictions on our services, other than to manage the account in accordance with your designated investment objective.

I have received, read, and understand this statement of disclosure/the CCMI firm brochure, and brochure supplement about CCMI, its advisors, its services and its fees. I also acknowledge receipt of the CCMI privacy policy.

Signed: Dated:

X_____ _____
Client

X_____ _____
Spouse

I acknowledge providing this information to the client(s) whose signature(s) appears above.

Signed: Dated:

X_____ _____
Representative for CCMI