

CHRISTY CAPITAL MANAGEMENT, INC.

CLIENT BROCHURE

ADV Form 2A

This brochure provides information about the qualifications and business practices of Christy Capital Management, Inc. If you have any questions about the contents of this brochure, please contact us at (478) 314-2160 or by email at: rebekah@christycapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Christy Capital Management, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Christy Capital Management, Inc.'s CRD number is: 149313

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Registration does not imply a certain level of skill or training.

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ITEM 2: MATERIAL CHANGES

Since our last annual amendment filed in February 2018 the following material changes have been made to this disclosure brochure:

- The firm has initiated a relationship with unaffiliated Sub Advisor Platforms to provide access to various model portfolio programs for our clients. Please refer to **Item 4 – Advisory Business** and **Item 5 – Fees and Compensation** for more specific information.
- In January 2018, our firm reached the level of assets under management where it is now eligible to request registration with the United States Securities and Exchange Commission.
- In May 2018 the firm's Chief Compliance officer was changed from Alex Westberry to Rebekah J. Bowker.
- In June 2018, owner Delmas Mark Wilson left the firm.

We will continue to ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31, so you will receive the summary of material changes, if any, no later than April 30 each year. At that time, we will also offer a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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ITEM 4: ADVISORY BUSINESS

A. Description of the Advisory Firm

Christy Capital Management, Inc. (hereinafter “CCM”) has been in business since December 14, 2005, and the principal owners are Brandon Scott Christy and Thomas Melvin NeeSmith, Jr. In January 2018, our firm reached the level of assets under management where it is now eligible to request registration with the United States Securities and Exchange Commission.

B. Types of Advisory Services

CCM offers the following services to advisory clients:

Based on a client's individual circumstances and needs, CCM will recommend an appropriate investment program to the client. Factors considered in making this recommendation include account size, risk tolerance, the opinion of each client and CCM's investment philosophy. CCM will assist the client in reviewing the client's income and expenditures, investment objectives, risk tolerance, liquidity requirements, investment restrictions and other relevant factors.

INVESTMENT ADVISORY SERVICES

CCM offers a combination of the following advisory services, where appropriate, to individuals, high net worth individuals, pension and profit sharing plans, trusts, estates or charitable organizations and corporations or other business entities.

CCM provides investment advice based on the client's individual objectives, needs, and risk tolerance, utilizing various security products, usually mutual funds, ETFs, and annuities.

Sub Advisor Program - CCM offers various programs that allows you to select third-party non-affiliated investment managers (“Sub Advisors”) to design and manage model portfolios for your assets.

We will assist you in completing a client profile questionnaire and review the information you provide. We will then recommend a Sub Advisor and corresponding model portfolio that aligns with your disclosed risk tolerance and investment objectives. CCM will enter all asset allocation transactions on your behalf within the Sub Advisor Platform. We are only able to recommend/select Sub Advisors which have been approved by the sponsoring advisory platform.

The advisory platforms require that these Sub Advisors follow certain parameters when building and managing a model portfolio the sub advisor will be given discretionary authority to select the specific investments for your account based on information and/or signals provided by the Sub Advisors; we will not have discretionary authority to select any specific funds for your account under this program. The sub advisor will implement the model for your account by acquiring the fund shares that are represented in the selected model portfolios. We will be available to answer questions that you may have regarding your account and act as the communication conduit between you and the Sub Advisors.

You should be aware that there may be other third-party managed programs not recommended by our firm, that are suitable for you and that may be less costly than arrangements recommended by our firm. No guarantees can be made that your financial goals or objectives will be achieved through the managed account program or by a recommended/selected Sub Advisor. Further, no guarantees of performance can ever be offered by our firm *(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.)*

Selection of Other Advisors

CCM offers advisory services by referring clients to a third-party money manager offering asset management and other investment advisory services. The third-party managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary. As a result of the referral, we are paid a portion of the fee charged and collected by the third-party money managers in the form of solicitor fees. Each solicitation arrangement is performed pursuant to a written solicitation agreement and is in compliance with SEC Rule 206(4)-3 and applicable state securities rules and regulations.

Under this program, we assist you with identifying your risk tolerance and investment objectives. We recommend third-party money managers in relation to your stated investment objectives and risk tolerance, and you may select a recommended third-party money manager or model portfolio based upon your needs. You must enter into an agreement directly with the third-party money manager who provides your designated account with asset management services.

We are available to answer questions that you may have regarding your account and act as the communication conduit between you and the third-party money manager. The third-party money manager may take discretionary authority to determine the securities to be purchased and sold for your account. We do not have any trading authority with respect to your designated account managed by the third-party money manager.

Although we review the performance of numerous third-party investment adviser firms, we enter into only a select number of relationships with third-party investment adviser firms that have agreed to pay us a portion of the overall fee charged to our clients. Therefore, CCM has a conflict of interest in that it will only recommend third-party investment advisors that will agree to compensate us for referrals of our clients.

Clients are advised that there may be other third-party managed programs not recommended by our firm, that are suitable for the client and that may be more or less costly than arrangements recommended by our firm. No guarantees can be made that a client's financial goals or objectives will be achieved by a third-party investment adviser recommended by our firm. Further, no guarantees of performance can ever be offered by our firm *(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.)*

Consulting Services

CCM offers ongoing advisement consultations for clients regarding 529 college savings plans. When providing these services, we review your financial situation, goals and objectives as well as the investment options available in the 529 plan. CCM will review your 529 plan account at agreed upon intervals and will make such recommendations from the list of available investment options in your 529 account as are deemed appropriate and consistent with your stated investment objectives and risk tolerance. 529 college savings plans limit how often an account owner can reallocate existing assets within a 529 college savings plan account such as only twice per calendar year, and consequently our services are limited to such restrictions. These services do not constitute asset management services for your 529 plan account; we do not have investment discretion or trading authority over your 529 plan account. You determine whether or not to implement our advice. The implementation of any trades in your 529 plan account is your responsibility.

CCM also offers advice to clients regarding asset allocation benefits selections for clients regarding employment retirement benefits. However, CCM does not offer investment advice for assets held in employer sponsored retirement plans (i.e. 401(k), 403(b), or TSP). At the client's request, CCM may recommend a third party to manage portfolio models within these employer sponsored plans. CCM will initially review and provide recommendations from the information provided by the client which are consistent with Client's stated investment objectives and risk tolerance. The services under this Agreement do not constitute asset management services or asset advisory services for Client's accounts; CCM will not have investment discretion or trading authority over

Client's accounts. Client will determine whether or not to implement CCM's advice. These consultations will cease once Client has made benefits selections. The implementation of any asset allocations or benefits elections will be solely the responsibility of Client.

Services Limited to Specific Types of Investments

CCM limits its investment advice to mutual funds, ETFs, equities, bonds, fixed income, debt securities, ETFs, third party money managers, REITs, insurance products including annuities, and government securities. CCM may use other securities as well to help diversify a portfolio when applicable.

C. Client-Tailored Services and Client-Imposed Restrictions

CCM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client profile which outlines each client's current situation (income, tax rates, and risk tolerance levels) and is used to construct a client-specific plan to aid in the selection of a portfolio that matches restrictions, needs, and goals.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CCM from properly servicing the client account, or if the restrictions would require CCM to deviate from its standard suite of services, CCM reserves the right to end the relationship.

D. Wrap Fee Programs

CCM does not participate in any wrap fee programs.

E. Amounts under Management

As of December 31, 2018, CCM manages \$150,826,838 of client assets all on a non-discretionary basis.

ITEM 5: FEES AND COMPENSATION

A. Fee Schedule

Investment Advisory Services Fees

Third-Party Money Managers

Third-party managers generally have account minimum requirements that will vary among third-party money managers. Account minimums are generally higher on fixed income accounts than for equity-based accounts. A complete description of the third-party money manager's services, fee schedules and account minimums will be disclosed in the third-party money manager's disclosure brochure which will be provided to you prior to or at the time an agreement for services is executed and the account is established.

The actual fee charged to you will vary depending on the third-party money manager. All fees are calculated and collected by the third-party money manager who will be responsible for delivering our portion of the fee paid by you to us.

Under this program, you may incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, and IRA and qualified retirement plan fees.

We have a conflict of interest by only offering those third-party money managers that have agreed to pay a portion of their advisory fee to us and have met the conditions of our due diligence review. There may be other third-party money managers that may be suitable for you that may be more or less costly. The portion of the advisory fee paid to CCM may be negotiated by the investor and their advisor. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

Sub-Advisor Managed Account Program

Fees for services provided through the Sub Advisor Managed Account Program are charged based on a percentage of assets under management paid monthly, in arrears, based upon the market value of the Assets on the last business day of the previous quarter. No increase in the annual fee percentage shall be effective without prior written notification to the client.

The services under this program continue in effect until terminated by either party (i.e., CCM, Sub-Advisor or you) by providing written notice of termination to the other parties. If services are terminated at any time other than the last business day of the month, fees for the final billing period will be determined on a pro rata basis using the number of days services are actually provided during the final period.

Fees for services provided through the Sub-Advisor Managed Account Program are negotiable based upon the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds or ETFs), the potential for additional account deposits, the relationship of the client with the investment adviser representative, the total amount of assets under management for the client, and the Sub Advisor chosen.

The annual fee for asset management services will be up to a maximum of 1.95%; CCM will receive up to 1.4% and the Sub-Advisor will receive the remainder of the fees charged.

The annual fee to be charged will be specified in the client's agreement with CCM.

CCM believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

Fees for services provided through the Sub Advisor Managed Account Program will be deducted from your account by the qualified custodian(s), split between Sub Advisor and CCM, and the respective share of such fees will be paid directly to each firm by the qualified custodian(s) of your account. You must authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to Sub Advisor and CCM. You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

Services through the Sub Advisor Managed Account Program may be offered both on a non-wrap fee basis. In a non-wrap fee program, the qualified custodian will charge a separate commission, ticket charge or fee for executing a securities transaction in addition to the investment advisory fee. CCM does not receive any portion of such commissions, ticket charges or custodial fees from the qualified custodian. If you choose the wrap fee program, you will only pay fees based on assets under management and you will not pay a separate commission, ticket charge or custodial fee for the execution of transactions in your account.

In addition to the fees described above, you may incur certain charges imposed by third parties in connection with investments made through your account including, but not limited to, ETF sales loads and management fees, sales charges and management fees for alternative investments, mutual fund sales loads, periodic mutual fund fees (e.g. 12b-1 trails) and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

Consulting Services

Fees for Consulting Services

Fees charged for our 529 Consulting Services are charged based on a percentage of asset value of the account, billed in arrears (at the end of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the current billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period. Fees charged for our consulting services are negotiable at the discretion of the Advisor based upon other business activity conducted by the client and the relationship of the client to the advisor.

The annual fee for 529 Consulting Services will be 1.40%. CCM believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

B. Payment of Fees

Payment of Investment Advisory Fees

Advisory fees are withdrawn directly from the client's accounts by the money manager with client written authorization. Fees are paid monthly or quarterly by the money manager to CCM in arrears.

Consulting Fees will be invoiced directly to each client on quarterly basis. Clients will pay for consulting fees by remitting a check upon receipt of their quarterly invoice.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e., custodian fees, mutual fund fees, ETF fees, transaction fees, etc.).

The solicitor fees paid to CCM represent only the fees paid to us and do not reflect operating expenses and other costs charged by mutual funds or other investments, and it is important you understand that these fees and expenses are ultimately borne by you, as the shareholder. Mutual funds and other investments may charge contingent deferred sales charges ("CDSC") or short-term redemption fees on withdrawals or redemptions. CCM is not responsible for any CDSC or short-term redemption fee charges incurred through your account. A complete description of all fees and expenses are in the relevant prospectuses. CCM is also not responsible for any transaction costs incurred while managing your account. In addition, CCM advises you to carefully review the custody agreement between you

and your custodian as there may be custodial fees charged to you for various services.

D. Prepayment of Fees

Advisory fees are paid monthly in arrears, not in advance.

TERMINATION

CCM may terminate the agreement with you at any time by providing you with written notice. Likewise, you may terminate the agreement at any time by providing CCM with written notice.

Upon termination of CCM's investment advisory services, CCM will have no obligation or authority to recommend or take any action with regard to the previously advised account.

The 529 Consulting Services will terminate upon either you or CCM providing written notice of termination to the other party. Since fees are billed in arrears, CCM will prorate the final fee payment based on the number of days services are provided during the final period. The amount of client assets on the termination date will be used to determine the final fee payment.

You may terminate the consulting services within five (5) business days of entering into an agreement with CCM without penalty or fees due. If you terminate the consulting services after five (5) business days of entering into an agreement with CCM, you will be responsible for immediate payment of any consulting work performed by CCM prior to the receipt by CCM of your notice.

E. Outside Compensation for the Sale of Securities to Clients

CCM does not accept outside compensation for the sale of securities to a client.

Clients Have the Option to Purchase Recommended Products from Other Brokers

Clients always have the option to purchase CCM-recommended products through other brokers or agents that are not affiliated with CCM. A client could invest in a mutual fund directly, without the services of CCM. In that case, the client would not receive the services provided by CCM which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

CCM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

ITEM 7: TYPES OF CLIENTS

CCM generally provides investment advice to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans
- Trusts, Estates, or Charitable Organizations

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF INVESTMENT LOSS

A. Methods of Analysis and Investment Strategies

CCM exclusively offers advisory services by referring clients to a third-party money manager offering asset management and other investment advisory services. The third-party managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary.

B. Material Risks Involved

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, ETFs, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

C. Risks of Specific Securities Utilized

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities, as described below:

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your *pro rata* share of the ETF's or mutual fund's

operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.

- **Management Risk** – Your investment varies with the success and failure of investment strategies, research, analysis and determination of portfolio securities. If your investment strategies do not produce the expected returns, the value of the investment will decrease.

ITEM 9: DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither CCM nor its representatives are registered as a Broker/Dealer or Broker/Dealer Representative.

B. Registration as a Futures Commission Merchant (FCM), Commodity Pool Operator (CPO), or a Commodity Trading Advisor (CTA)

Neither CCM nor its representatives are registered as a FCM, CPO, or CTA.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Associated persons of CCM are insurance agents or brokers for one or more insurance companies. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. CCM always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CCM in their capacity as an insurance agent.

D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

CCM may direct clients to a third-party money manager. CCM will be compensated via a fee share from those to which it directs those clients. This relationship will be disclosed in each contract between CCM and the third-party money manager. The fees shared will not exceed any limit imposed by any regulatory agency. Before selecting other advisors for clients, CCM will always ensure those other advisors are properly licensed or registered as investment advisor. This creates a conflict of interest in that CCM has an incentive to direct clients to the third-party money managers that provide CCM with a larger fee split. CCM will always act in the best interests of the client, including when determining which third-party manager to recommend to clients.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Code of Ethics

Code of Ethics Summary

According to the *Investment Advisers Act of 1940*, an investment adviser is considered a fiduciary and has a fiduciary duty to all clients. CCM has established a Code of Ethics to comply with the requirements of Section 204(A)-1 of the *Investment Advisers Act of 1940* that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. The Code of Ethics covers all individuals that are classified as “supervised persons.” All employees, officers, directors and investment adviser representatives are classified as supervised persons. CCM requires its supervised persons to consistently act in your best interest in all advisory activities. CCM imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm’s fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of CCM. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

Affiliate and Employee Personal Securities Transactions Disclosure

CCM or associated persons of the firm may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a conflict of interest. It is the express policy of CCM that all persons associated in any manner with our firm must place clients’ interests ahead of their own when implementing personal investments. CCM and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To prevent conflicts of interest, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client.
- Associated persons cannot purchase or sell any security for their personal accounts prior to advising on transactions for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an “insider.”
- Associated persons are discouraged from conducting frequent personal trading.
- Associated persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted by the Chief Compliance Officer of CCM.

Any associated person not observing our policies is subject to sanctions up to and including termination.

B. Recommendations Involving Material Financial Interests

CCM does not recommend that clients buy or sell any security in which a related person to CCM has a

material financial interest.

ITEM 12: BROKERAGE PRACTICES

A. Factors Used to Select Custodians and/or Broker/Dealers

CCM exclusively offers asset management services by referring clients to sub-advisors and third-party money managers offering asset management and other investment advisory services. In CCM's sub-advisory relationships the firm will monitor the client's account and place asset allocation transactions in the client accounts within the trading platform provided by the sub advisor. In a third-party manager relationship, the third part manager is responsible for continuously monitoring client accounts and making trades in client accounts when necessary.

Directed Brokerage

Clients are required to utilize the broker-dealer selected by the unaffiliated sub-advisor/asset management firm providing the day-to-day services to the client.

Soft Dollar Benefits

CCM does not have a soft dollar agreement with a broker-dealer or a third-party.

Handling Trade Errors

In our sub-advisory program CCM has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of CCM to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by CCM if the error is caused by CCM. If the error is caused by the sub-advisor, the sub-advisor is responsible for handling the trade error. If an investment gain results from the correcting trade, the gain remains in the client's account unless the same error involved other client account(s) that should also receive the gains. It is not permissible for all clients to retain the gain. CCM may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons).

Agency Cross Transactions

Our associated persons are prohibited from engaging in agency cross transactions, meaning we cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

ITEM 13: REVIEWS OF ACCOUNTS

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

CCM will provide reviews as contracted for at the inception of the advisory relationship. At least annually, individual clients are asked to meet with their Financial Advisor. Together, the client and the Financial Advisor determine whether a change in their objectives warrants a change in the criteria used to manage their account.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's

financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Whether reports by an outside money manager are provided to you will depend upon the outside money manager.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. CCM receives no other forms of compensation in connection with providing investment advice.

Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.

We may from time to time receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are typically the result of informal expense-sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as client appreciation events, advertising, publishing, and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are typically made by those sponsors for which sales have been made or for which it is anticipated sales will be made. This creates a conflict of interest in that there is an incentive to recommend certain products and investments based on the receipt of this compensation instead of what is in the best interest of our clients. We attempt to control for this conflict by always basing investment decisions on the individual needs of our clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

CCM provides compensation to Retirement Benefits Institute, Inc. (RBI) for client referrals. RBI is owned by Brandon Christy and is disclosed as a conflict of interest. RBI provides Federal Benefits training to attendees to educate them on the federal retirement systems, both FERS and CSRS. RBI does not solicit any financial product on behalf of CCM. Training attendees are given the option to request a Federal Benefits Analysis at no charge to the attendee. Upon request, training attendees will be contacted by RBI employees to gather the necessary information from the training attendee to generate the Federal Benefits Analysis and to schedule an appointment with a CCM staff member and/or Planner to discuss the results of their Federal Benefits Analysis. RBI is compensated for each first meeting conducted by CCM planners and does not receive any compensation from financial or insurance services provided by CCM or other like entities.

ITEM 15: CUSTODY

CCM does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the custodian, TD Ameritrade. Clients will receive account statements from the custodian and should carefully review those statements. CCM urges clients to compare the account statements they receive from the custodian with those they may receive from CCM.

ITEM 16: INVESTMENT DISCRETION

CCM does not maintain discretionary authority over client accounts.

ITEM 17: VOTING CLIENT SECURITIES (PROXY VOTING)

CCM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

ITEM 18: FINANCIAL INFORMATION

A. Balance Sheet

CCM does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither CCM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

CCM has not been the subject of a bankruptcy petition in the last ten years.