



Cheviot Value Management, LLC

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Form ADV, Part 2A Brochure

February 23, 2024

This brochure provides information about the qualifications and business practices of Cheviot Value Management, LLC. If you have any questions about the contents of this brochure, please contact us at contact@cheviot.com or (310) 451-8600. 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.

Any reference to or use of the terms “registered investment adviser” or “registered” does not imply that Cheviot Value Management, LLC, or any person associated with Cheviot Value Management, LLC has achieved a certain level of skill or training. Additional information about Cheviot Value Management, LLC is available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2 – MATERIAL CHANGES

The purpose of this page is to inform you of any material changes to our brochure. If you are receiving this brochure for the first time this section may not be relevant to you.

Cheviot Value Management, LLC (“CVM”) reviews and updates our brochure at least annually to confirm that it remains current. We have not made any material changes to our brochure since the previous annual update, dated February 23, 2024.

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ITEM 4 – ADVISORY BUSINESS

Description of Advisory Firm

Cheviot Value Management, LLC (“CVM,” “we,” “our,” or “us”) is a privately owned limited liability company headquartered in Beverly Hills, CA. Frederic G. Marks and Nancy J. Marks founded CVM in 1974. In 1985, the firm transitioned to investment management and became registered with the Securities and Exchange Commission in 1985. David A. Horvitz and Darren C. Pollock assumed control of the firm in January 2013 upon the Marks’ retirement.

Fiduciary Duty

Registered investment advisers are considered fiduciaries under federal law. Our fiduciary duty carries with it an obligation to act in the best interest of our clients pursuant to a relationship of trust and confidence. It encompasses a *duty of care* and a *duty of loyalty*.

Duty of Care

The duty of care includes, among other things,

1. the duty to provide advice that is in the best interest of the client;
2. the duty to seek best execution of a client’s transactions where the adviser has the responsibility to select broker-dealers to execute client trades; and
3. the duty to provide advice and monitoring over the course of the relationship.

The duty to provide advice suitable to each client based on a reasonable understanding of the client’s objectives is a critical component of the duty of care. Providing suitable advice includes making a reasonable inquiry into the client’s financial situation, investment experience, and financial goals and then updating this information as necessary throughout the course of the relationship to reflect the client’s changing objectives over time and adjusting the advice we provide to reflect any changed circumstances.

When CVM has the responsibility to select broker-dealers to execute client trades in discretionary accounts, we seek to trade such that the client’s total cost or proceeds in each transaction are the most favorable under the circumstances. In doing so, we consider the full range and quality of a broker’s services and so the determinative factor is not necessarily the lowest possible commission cost but whether the transaction represents the best qualitative execution. Moreover, we periodically and systematically evaluate the execution we receive on behalf of our clients.

Our duty of care includes an obligation to provide advice and monitoring at a frequency that is in the best interest of the client, taking into account the scope of the agreed relationship. This scope is indicated by the duration and nature of the services as outlined in each client’s advisory arrangement and extends to all personalized advice provided to clients.

Duty of Loyalty

CVM adheres to a duty of loyalty where we seek to serve the best interests of our clients and never subordinate the interests of our clients to our own. Simply put, CVM cannot place its own interests ahead of the interests of our clients. In observance of this duty, we must make full and fair disclosure to clients of all material facts relating to the advisory relationship. Further, we also seek to eliminate or at least expose through full and fair disclosure all conflicts of interest which might incline CVM, consciously

or unconsciously, to render advice that is not disinterested. We believe that in order for disclosure to be full and fair, it should be sufficiently specific so that each client is able to understand the material fact or conflict of interest and make an informed decision whether to provide consent. Consequently, we provide this ADV 2A brochure to all prospective clients at or before entering into a contract so that they can use the information within to decide whether or not to enter into an advisory relationship.

Advisory Services Offered

CVM offers the following services to advisory clients:

Investment Management Services

CVM provides continuous and regular investment supervisory services on a discretionary basis. Darren C. Pollock, David A. Horvitz, and James M. Whiting have the ongoing responsibility to select investments CVM purchases or sells in client accounts.

CVM will primarily utilize the following investment types when making purchases in client accounts:

1. Equity securities, including stocks and foreign securities listed on US exchanges (ADRs) or foreign exchanges (ordinaries)
2. Fixed income securities, including corporate and government bonds
3. Municipal securities
4. Exchange traded funds (ETFs)
5. Money market funds and other cash equivalents

Depending on the client's individual investment objectives and needs, many portfolios further include, as CVM deems appropriate:

1. Securities with equity and debt characteristics, including convertible bonds, preferred stocks or other preferred securities
2. Mutual funds*
3. Closed-end funds
4. Master limited partnerships (MLPs)

*Mutual funds are generally utilized only in special situations, including but not limited to seeking diversification in smaller accounts or accessing certain securities in the fund's underlying holdings that would otherwise be difficult to obtain. CVM may also occasionally utilize additional types of investments at our discretion. We describe the material investment risks for many of the securities that we utilize under the heading ***Specific Security Risks*** in ***Item 8*** below.

Financial Planning Services

CVM provides complimentary financial planning services as part of our overall investment management services at a client's request or for a separate fee to non-investment management clients, as described below. Clients receive a written financial plan providing the client with detailed analyses and recommendations designed in an effort to help them achieve their stated financial goals and objectives. In general, we seek to address all or part of the following areas in the financial plan:

- Goals and objectives
- Net worth
- Cash flow planning
- Tax planning review
- College funding
- Risk management and insurance planning
- Retirement planning
- Investment planning
- Estate planning

CVM gathers information through in-depth personal interviews and document requests. Information gathered generally includes a client's current financial status, future life goals, and attitudes towards risk. Related documents supplied by the client are carefully reviewed by CVM, and a written report is prepared. Should a client choose to implement the recommendations contained in the plan, CVM suggests the client work closely with his/her attorney, accountant, insurance agent, mortgage broker, and/or investment adviser. Implementation of financial plan recommendations is entirely at the client's discretion. Clients may choose but are not required to have CVM assist with financial plan implementation, including investment management services. Fees for investment management and stand-alone financial planning services are described below in ***Item 5 – Fees and Compensation***. Clients that choose to utilize CVM for financial plan implementation should keep us informed of any changes to their financial situation so that we can determine if corresponding adjustments to the financial plan are necessary.

Limitations on Investments

In some circumstances, CVM's advice may be limited to certain types of securities.

Limitation by Plan Sponsor/Employer

In the event CVM is managing assets within a retirement plan such as 401(k), 403(b), QRP or other employer plan, CVM is limited to those investment providers and investment options chosen by the plan administrator. Similarly, when we provide services to participants in an employer-sponsored plan, the participant may be limited to investing in securities included in the plan's investment options. Therefore, CVM can only select investments to the client from among the available options and will not invest the client's account in other securities, even if there may be more suitable options elsewhere.

Mutual Fund Limitations

Generally, CVM limits mutual fund selections to no load funds or load-waived equivalents.

Limitation by Client

CVM may also limit advice based on certain client-imposed restrictions. For more information about the restrictions clients can put on their accounts, see ***Tailored Services and Client Imposed Restrictions*** in this Item below.

Non-Managed Assets

At its discretion, CVM may offer securities trading activities for cash and securities in a client's non-managed account, acting as an intermediary between the client and the custodian of the non-managed

account. We do not generally provide investment advice regarding a client's non-managed assets or provide opinions as to the merits of any securities in non-managed accounts. We also do not make any judgments as to the appropriateness of assumed risk or suitability of any non-managed investment given the client's situation. At our discretion, CVM may offer this service in consideration of the client's other accounts that we manage.

Tailored Services and Client Imposed Restrictions

CVM makes individual investment decisions for clients based on a financial review and plan to help clients formulate realistic investment objectives. We then develop an investment policy in an effort to achieve those objectives. It is the client's responsibility to keep us informed of any changes to his/her investment objectives.

In limited circumstances, clients may request restrictions on the account, such as when a client needs to keep a minimum level of cash in the account or does not want CVM to buy or sell specific securities or security types in the account. CVM reserves the right to not accept and/or terminate management of a client's account if we feel that the client-imposed restrictions would limit or prevent us from meeting or maintaining our overall investment strategy for the client.

Wrap Fee Programs

We do not provide portfolio management services to a wrap fee program.

Assets Under Management

CVM manages client assets in discretionary accounts on a continuous and regular basis. As of January 29, 2024, CVM had \$822,972,737 in assets under our management.

ITEM 5 - FEES AND COMPENSATION

Fee Schedule

Investment Management Services

CVM charges advisory fees for investment management services at an annual rate of 1.00% of the client's total assets under management. Our standard fee rate may be negotiable based on a number of factors, which include but are not limited to "grandfathered" accounts, related accounts, and other structures that we may consider in special situations. Some accounts are billed under different fee schedules honoring prior agreements and/or legacy arrangements with outside managers that have referred clients to CVM. We also manage accounts for some family members and friends without charge. At our discretion, we may adjust a client's fee on a pro-rata basis for withdrawals or additions made to their account during the billing quarter.

Financial Planning Services

CVM provides financial planning services without additional charge to clients that also engage us for investment management services. Clients that do not utilize CVM for investment management may choose between an hourly or fixed fee for financial planning services. Factors used in determining the cost of a financial plan include the complexity and nature of the client's circumstances and the overall

scope of the plan. Our hourly rate is \$375 per hour and fixed fee engagements typically total between \$2,500 and \$5,000. We quote all estimated fees after the complimentary initial client meeting. We also provide financial planning to some family members and friends without charge.

Billing Method

Investment Management Services

CVM's advisory fees are payable quarterly in arrears based on the account market value on the last business day of the calendar quarter. The first payment is due after the first quarter under management. The formula used for the calculation is as follows: $(\text{Annual Rate}) \times (\text{Total Assets Under Management at Quarter-End}) / 4$. For advisory fee calculation purposes, a calendar quarter is a period beginning on January 1, April 1, July 1, or October 1 and ending on the day before the next quarter. A day is any calendar day including weekends and holidays. For new accounts, the number of days remaining in the quarter is the number of calendar days following the date a new account is funded.

The client may choose to have advisory fees withdrawn directly from their custodian account or to pay by check. If the client authorizes advisory fees to be withdrawn directly from their custodian account, the custodian will withdraw CVM's advisory fee upon receipt of CVM's instructions, typically the first month after the quarter in which advisory services were rendered. All clients will receive brokerage statements from the custodian no less frequently than quarterly. The custodian statement will show the deduction of the advisory fee. It is the client's responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated.

Additionally, CVM will send a statement to each client who authorizes CVM to withdraw fees directly from the custodian. The statement will show the amount of the fee, the value of the client's assets upon which we based the fee, and the specific manner in which we calculated the fee.

CVM will send an invoice to all clients who choose not to have advisory fees withdrawn directly from their custodian account. The invoice is payable upon receipt and will include the fee calculation and amount due.

Financial Planning Services

A \$1,000 retainer is due for all hourly and fixed fee stand-alone financial planning arrangements. The remainder of the fee is due when the final financial plan is presented to the client. In the event that your situation becomes substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. You must approve the fee change in advance of the additional work being performed when a fee increase is necessary. For clients that terminate services before the plan is complete, CVM will provide a pro rata refund of fees paid in advance that remain unearned at time of termination.

Other Fees and Expenses

CVM's fees do not include custodian fees. Clients pay all brokerage commissions, stock transfer fees, and/or other similar charges incurred in connection with transactions in accounts from the assets in the account. These charges are in addition to the fees client pays to CVM. See **Item 12 - Brokerage Practices** below for more information. In addition, any mutual fund shares held in a client's account are subject to

any 12b-1 fees, early redemption fees, and other fund-related expenses. The fund's prospectus fully describes the fees and expenses. All fees paid to CVM for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds. Mutual funds pay advisory fees to their managers, which are indirectly charged to all holders of the mutual fund shares.

Termination

Either party may terminate the advisory agreement at any time without advance notice. Clients may provide termination notice orally, but CVM will generally confirm any oral notice in writing. Upon termination of the agreement, any earned, unpaid advisory fees will be due and payable. The client will receive an invoice showing the advisory fees due for services rendered and not yet paid.

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

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

ITEM 7 - TYPES OF CLIENTS

CVM generally provides discretionary investment advisory services to individuals, high net worth individuals, trusts and estates, and individual participants of retirement plans. In addition, we offer advisory services to charitable organizations, corporations, and pension/profit sharing plans.

Account Requirements

Generally, CVM requires clients to maintain a minimum portfolio size of \$400,000 to \$2,000,000 depending on the Financial Advisor(s) responsible for managing the portfolio accounts. Withdrawal of significant funds may result in a request for additional fund deposits to continue with management of the client's portfolio. At our discretion, we may combine family accounts to meet the account size minimum or reduce or waive the account minimum requirements.

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

Methods of Analysis and Investment Strategies

CVM manages all client accounts using a value-oriented discipline. CVM generally uses diversification in an effort to optimize the risk and potential return of client accounts. More specifically, we utilize multiple asset classes, investment styles, market capitalizations, sectors, and regions to provide diversification. However, client accounts may be concentrated at times and the portfolio composition will vary according to the current views and market outlook determinations of Darren C. Pollock, David A. Horvitz, and James M. Whiting.

Methods of Analysis for Selecting Securities

CVM uses fundamental analysis in the selection of individual equity and fixed income securities. Fundamental analysis typically involves analysis of corporate financial statements, management presentations, specialized research publications, and general news sources. Additionally, CVM may use specific strategies or resources in the method of analysis and selection of fixed income securities.

We also use prospectuses and other relevant information from bond underwriters to help in analysis and selection of fixed income securities. Regarding fixed income investments, CVM considers the financial strength of the issuer, call provisions, liquidity factors, and bond insurance in selecting bonds for purchase. When practical, CVM solicits bids from several underwriters (i.e., brokerages) in an effort to obtain the most attractive yield on purchase.

Specific Investment Strategies for Managing Portfolios

CVM may use tactical asset allocation, cash as a strategic asset, long-term holding, defensive, inverse/enhanced market, absolute return, and/or concentrated portfolio strategies, in the construction and management of client portfolios.

Tactical Asset Allocation

CVM may use tactical asset allocation strategies in the management of client accounts. Tactical asset allocation is an active management portfolio strategy that re-balances the percentage of assets held in various asset categories in an effort to take advantage of market pricing anomalies or strong market sectors. This strategy provides an opportunity for CVM to create extra value by taking advantage of certain situations in the marketplace. CVM considers this a moderately active strategy since we return the portfolio to its original strategic asset mix if we achieve desired short-term profits or the perceived opportunity ends. There is no guarantee that this strategy will be successful, and we make no promises or warranties as to the accuracy of our market analysis.

Cash as a Strategic Asset

CVM allocates cash in accordance with the views of Darren C. Pollock and/or David A. Horvitz regarding the relative desirability of being more or less fully invested in other asset classes from time to time.

Long-term Holding

CVM does not generally purchase securities for clients with the intent to sell the securities within 30 days of purchase, as CVM does not use short-term trading as an investment strategy. However, there may be times when CVM will sell a security for a client when the client has held the position for less than 30 days.

Defensive Strategies

CVM may invest in any stock, bond, or cash security in the exercise of our discretion. CVM has full discretion in how we allocate client accounts among security types. CVM will not rebalance accounts to any specific target allocation. Actual allocation will vary over time in accounts. At any time, client accounts may hold significant levels of cash and/or cash equivalents. Account allocations are likely to vary significantly compared to the overall equity markets as well as compared to any particular benchmark.

Inverse/Enhanced Market

CVM may also use leveraged long and short mutual funds and/or exchange traded funds that are designed to perform in either an:

1. Inverse relationship to certain market indices (at a rate of one or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; or

2. Enhanced relationship to certain market indices (at a rate of one or more times the actual result of the corresponding index) as an investment strategy and/or in an effort to increase gains in an advancing market.

Absolute Return

CVM may deploy an absolute return strategy using long equity positions offset by short equity positions in an effort to produce positive returns regardless of capital market fluctuations. The investment philosophy is value oriented with a more concentrated portfolio construction and intermediate term investment horizon (18-24 months on average).

Concentrated Portfolios

CVM's investment management style may result in client accounts being invested in a limited number of securities.

There can be no assurance that any of the above strategies will prove profitable or successful.

General Risk of Loss Statement

Prior to entering into an agreement with CVM, the client should carefully consider:

1. That investing in securities involves risk of loss which clients should be prepared to bear;
2. That securities markets experience varying degrees of volatility;
3. That over time the client's assets will fluctuate and at any time be worth more or less than the amount invested; and
4. That clients should only commit assets to CVM that they feel are available for investment on a long-term basis.

Specific Security Risks

General Risks of Owning Securities

The prices of securities held in client accounts and the income generated from those securities may decline in response to certain events taking place around the world. These include events directly involving the issuers of securities in a client's account, conditions affecting the general economy, and overall market changes. Other contributing factors include local, regional, or global political, social, or economic instability and governmental or governmental agency responses to economic conditions. Finally, currency, interest rate, and commodity price fluctuations may also affect security prices and income.

Equity Securities

Equity securities represent an ownership position in a company. Equity securities typically consist of common stocks or mutual funds and ETF's investing in common stocks. The prices of equity securities fluctuate based on, among other things, events specific to their issuers and market, economic and other conditions. For example, prices of these securities can be affected by financial contracts held by the issuer or third parties (such as derivatives) relating to the security or other assets or indices.

Small Capitalization Equity Securities

Investing in smaller companies may pose additional risks as it is often more difficult to dispose of small company stocks, more difficult to obtain information about smaller companies, and the prices of their stocks may be more volatile than stocks of larger, more established companies. Clients should have a long-term perspective and, for example, be able to tolerate potentially sharp declines in value.

Short Selling Equity Securities

Borrowing a security and selling that security (short selling) with the intent of repurchasing the same in a future period at a lower price is inherently riskier than purchasing a stock for ownership (long) given the potential for asymmetric returns (a stock price can only go as low as zero but has theoretically no limit to the upside). Short selling is used only within the Absolute Return strategy and is deployed as a hedge against exposure on the long side. CVM does not deploy un-hedged short positions (short exposure not offset by long exposure).

American Depositary Receipts (ADRs)

An ADR is a security that trades on United States exchanges but represents a specified number of shares in a foreign corporation. Investors buy and sell ADRs on American markets just like regular stocks. Some banks and brokerage firms issue/sponsor ADRs. ADRs are subject to additional risks of investing in foreign securities, including, but not limited to, less complete financial information available about foreign issuers, less market liquidity, more market volatility, and political instability. In addition, currency exchange-rate fluctuations affect the U.S. dollar-value of foreign holdings.

Some ADRs and ordinary shares of foreign securities pay dividends, and many foreign countries impose dividend withholding taxes of up to 30%. Depending on a custodian's ability to reclaim any withheld foreign taxes on dividends, taxable accounts may be able to recoup a portion of these taxes by use of the foreign tax credit. However, tax-exempt accounts, to the extent they pay any foreign withholding taxes, may not be able to utilize the foreign tax credit. Therefore, investors may be unable to recover any foreign taxes withheld on dividends of foreign securities or ADRs.

Debt Securities (Bonds)

Issuers use debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Certain additional risk factors relating to debt securities include:

Reinvestment Risk

When interest rates are declining, reinvested interest income and any return of principal, whether scheduled or unscheduled, is at lower prevailing rates.

Inflation Risk

Inflation causes tomorrow's dollar to be worth less than today's; in other words, it reduces the purchasing power of a bond investor's future interest payments and principal, collectively known as "cash flows." Inflation also leads to higher interest rates, which in turn leads to lower bond prices.

Interest Rate and Market Risk

Debt securities may be sensitive to economic changes, political and corporate developments, and interest rate changes. Investors can also expect periods of economic change and uncertainty, which can result in increased volatility of market prices and yields of certain debt securities. For example, prices of these securities can be affected by financial contracts held by the issuer or third parties (such as derivatives) relating to the security or other assets or indices.

Call Risk

Debt securities may contain redemption or call provisions entitling their issuers to redeem them at a specified price on a date prior to maturity. If an issuer exercises these provisions in a lower interest rate market, the account would have to replace the security with a lower yielding security, resulting in decreased income to investors.

Usually, a bond is called at or close to par value. This subjects investors that paid a premium for their bond to a risk of lost principal. In reality, prices of callable bonds are unlikely to move much above the call price if lower interest rates make the bond likely to be called.

Credit Risk

If the issuer of a debt security defaults on its obligations to pay interest or principal or is the subject of bankruptcy proceedings, the account may incur losses or expenses in seeking recovery of amounts owed to it.

Liquidity and Valuation Risk

There may be little trading in the secondary market for particular debt securities, which may adversely affect the account's ability to value accurately or dispose of such debt securities. Adverse publicity and investor perceptions, whether or not based on fundamental analysis, may decrease the value and/or liquidity of debt securities.

It may be possible to reduce the risks described above through diversification of the client's portfolio and by credit analysis of each issuer, as well as by monitoring broad economic trends and corporate and legislative developments, but there can be no assurance that we will be successful in doing so. Credit ratings for debt securities provided by rating agencies reflect an evaluation of the safety of principal and interest payments, not market value risk. The rating of an issuer is a rating agency's view of past and future potential developments related to the issuer and may not necessarily reflect actual outcomes. There can be a lag between the time of developments relating to an issuer and the time a rating is assigned and updated.

Bond rating agencies may assign modifiers (such as +/-) to ratings categories to signify the relative position of a credit within the rating category. Unless we state otherwise, clients should include any security within that category without considering the modifier when reading their investment policies based on ratings categories.

Municipal Bonds

Municipal bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk. Investing in municipal bonds carries risk unique to these types of bonds, which may include:

Legislative Risk

Legislative risk includes the risk that a change in the tax code could affect the value of taxable or tax-exempt interest income.

Tax-Bracket Changes

Municipal bonds generate tax-free income, and therefore pay lower interest rates than taxable bonds. Investors who anticipate a significant drop in their marginal income-tax rate may benefit from the higher yield available from taxable bonds.

Liquidity Risk

The risk that investors may have difficulty finding a buyer when they want to sell and may be forced to sell at a significant discount to market value. Liquidity risk is greater for thinly traded securities such as lower-rated bonds, bonds that were part of a small issue, bonds that have recently had their credit rating downgraded or bonds sold by an infrequent issuer. Municipal bonds may be less liquid than other bonds.

Credit Risk

Credit risk includes the risk that a borrower will be unable to make interest or principal payments when they are due and therefore default. To reduce investor concern, insurance policies that guarantee repayment in the event of default back many municipal bonds.

Alternative Minimum Tax (AMT)

CVM invests in a variety of fixed income securities for clients. It is possible that we will invest in municipal bonds subject to the AMT.

General Obligation vs. Revenue Bonds

Typically, investors consider General Obligation bonds to be safer than Revenue bonds since the full faith and credit of the issuer backs the interest and principal payments. With revenue bonds, the interest and principal are dependent upon the revenues paid by users of the facility or service. Frequently the issuers of revenue bonds are either private sector corporations (e.g., hospitals) or entities that exist, often in local monopoly form, to provide a public service (e.g., power utilities or public transportation authorities). Consequently, the thought is that the consumer spending that provides the funding or income stream for revenue bond issuers may be more vulnerable to changes in consumer tastes or a general economic downturn compared to a state or city's ability to raise taxes to pay for its General Obligation commitments.

Municipal Bonds of a Particular State

Municipal bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Securities issued by California municipalities are more susceptible to factors adversely affecting issuers of California securities. For example, in the past, California voters have passed amendments to the state's constitution and other measures that limit the taxing and spending authority of California governmental entities, and future voter initiatives may adversely affect California municipal bonds.

Cash and Cash Equivalents

Accounts generally hold a portion in cash or invest in cash equivalents. Cash equivalents include:

1. commercial paper (for example, short-term notes with maturities typically up to 12 months in length issued by corporations, governmental bodies or bank/corporation sponsored conduits [asset-backed commercial paper]);
2. short-term bank obligations (for example, certificates of deposit, bankers' acceptances [time drafts on a commercial bank where the bank accepts an irrevocable obligation to pay at maturity]) or bank notes;
3. savings association and savings bank obligations (for example, bank notes and certificates of deposit issued by savings banks or savings associations);
4. securities of the U.S. government, its agencies or instrumentalities that mature, or may be redeemed, in one year or less;
5. corporate bonds and notes that mature, or that may be redeemed, in one year or less; and
6. money market mutual funds that may include any or all of the above cash and cash equivalents listed in 1 through 5.

Cash and cash equivalents are the most liquid of investments. Cash and cash equivalents are considered very low-risk investments, meaning there is little risk of losing the principal investment. Typically, low risk also means low return and the interest an investor can earn on this type of investment is low relative to other types of investing vehicles.

Investing Outside the U.S.

Investing outside the United States involves additional risks of foreign investing. These risks may include currency controls and fluctuating currency values, and different accounting, auditing, financial reporting, disclosure, and regulatory and legal standards and practices. Additional factors may include changing local, regional, and global economic, political, and social conditions. Further, expropriation, changes in tax policy, greater market volatility, different securities market structures, and higher transaction costs can be contributors. Finally, various administrative difficulties, such as delays in clearing and settling portfolio transactions or in receiving payment of dividends can also lead to additional risk.

Financial Planning

The financial planning tools CVM uses to create financial plans for clients rely on various assumptions, such as estimates of inflation, risk, economic conditions, and rates of return on security asset classes. Return assumptions generally reflect asset class returns instead of actual investment returns, and do not always include fees or expenses that clients would pay if they invested in some specific products.

Financial planning software is only a tool used to help guide CVM and the client in developing an appropriate plan, and we cannot guarantee that clients will achieve the results shown in the plan. Results will vary based on the information provided by the client regarding the client's assets, risk tolerance, and personal information. Changes to the program's underlying assumptions or differences in actual personal, economic, or market outcomes will generally impact client results.

Clients should carefully consider the assumptions and limitations of the financial planning software and should discuss the results of the plan with us before making any changes to their investments or financial plan. If the financial plan includes recommendations for investing in securities, you should understand that investing in securities involves risk of loss, and you should be prepared to bear that risk.

Other Risks

Cybersecurity

Information and technology systems can be vulnerable to damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltrations by unauthorized persons and security breaches, usage errors by its professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. Although we have implemented various measures to manage risks relating to these types of events, if these systems are compromised, or become inoperable for extended periods of time, or cease to function properly, we may have to make a significant investment to fix or replace them. The failure of these systems can cause significant interruptions in our operations and result in a failure to maintain the security, confidentiality or privacy of sensitive data, including personal information relating to clients. Such a failure could potentially harm our reputation, subject us to legal claims, and otherwise have an adverse impact on our ability to perform advisory functions.

Pandemics and Other Public Health Crises

Pandemics and other health crises, such as the outbreak of an infectious disease such as severe acute respiratory syndrome, avian flu, H1N1/09 flu and COVID-19 or any other serious public health concern, together with any resulting restrictions on travel or quarantines imposed, could have a negative impact on the economy, and business activity in any of the areas in which client investments may be located. Such disruption, or the fear of such disruption, could have a significant and adverse impact on the securities markets, lead to increased short-term market volatility or a significant market downturn, and can have adverse long-term effects on world economies and markets generally.

ITEM 9 - DISCIPLINARY INFORMATION

CVM and our personnel seek to maintain the highest level of business professionalism, integrity, and ethics. CVM does not have any disciplinary information to disclose.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

CVM does not offer any other services or have any affiliates in the financial industry. While we may refer clients to other professionals (see Item 14 below), we receive no compensation and do not believe that any of these referrals creates a material conflict of interest.

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

Code of Ethics

CVM believes that we owe clients the highest level of trust and fair dealing. As part of our fiduciary duty, we place the interests of our clients ahead of the interests of the firm and our personnel. CVM's personnel are required to conduct themselves with integrity at all times and follow the principles and policies detailed in our Code of Ethics.

CVM's Code of Ethics attempts to address specific conflicts of interest that either we have identified or that could likely arise. CVM's personnel are required to follow clear guidelines from the Code of Ethics in areas such as gifts and entertainment, other business activities, prohibitions of insider trading, and adherence to applicable state and federal securities laws. Additionally, individuals who make investment decisions to clients, or who have access to nonpublic information regarding any client's purchase or sale of securities are subject to personal trading policies governed by the Code of Ethics (see below).

CVM will provide a complete copy of the Code of Ethics to any client or prospective client upon request.

Personal Trading Practices

CVM and our personnel also purchase or sell securities for themselves, regardless of whether the transaction would be appropriate for a client's account. CVM and our personnel regularly purchase or sell securities for themselves that we also utilize for clients. This includes related securities (e.g., warrants, options, or futures). This presents a potential conflict of interest as it could create an incentive to take investment opportunities from clients for our own benefit, favor our personal trades over client transactions when allocating trades, or to use the information about the transactions we intend to make for clients to our personal benefit by trading ahead of clients.

Our policies to address these conflicts include the following:

1. When transacting outside of an aggregated ("block") trade, the client receives the opportunity to act on investment decisions prior to and in preference to accounts of CVM and our personnel. Otherwise, clients and CVM receive investment opportunities concurrently when we conduct block trades. We describe our aggregation practices in detail under **Aggregation and Allocation of Transactions** in Item 12, below.
2. CVM prohibits trading in a manner that takes personal advantage of price movements caused by client transactions.
3. If we wish to purchase or sell the same security as we recommend or take action to purchase or sell for a client, we will not do so until the custodian fills client orders (except when the transaction meets our **de minimis policy** described below or when we are aggregating personal and proprietary trades with client trades as disclosed under **Aggregation with Client Orders** below). As a result of this policy, it is possible that clients will receive a better or worse price than CVM or any employee for the same security on the same day as a client or one or more days before or after the client's transaction.

4. CVM requires our personnel to obtain pre-approval for personal trades from the Chief Compliance Officer for personal trades in client held securities or securities that we are considering for purchase or sale in client accounts, with the following exceptions:
 - a. Transactions that fall under our ***de minimis policy*** described below;
 - b. Transactions effected pursuant to an automatic investment plan;
 - c. Securities held in accounts over which CVM's personnel have no direct or indirect influence or control;
 - d. Transactions and holdings in direct obligations of the Government of the United States;
 - e. Money market instruments, banker's acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments;
 - f. Transactions and holdings in shares of mutual funds, since CVM has no material relationship with an investment company; and
 - g. Transactions in units of a unit investment trust if the unit investment trust is invested exclusively in unaffiliated mutual funds.
5. CVM requires our personnel to report personal securities transactions on a quarterly basis.
6. Under certain limited circumstances, we make exceptions to the policies stated above. CVM will maintain records of these trades, including the reasons for any exceptions.

De minimis Policy

Securities transactions by CVM and our personnel are generally subject to a pre-clearance policy that seeks to make personal trading consistent with our fiduciary duty to clients. However, CVM and our personnel are not required to pre-clear certain de minimis transactions that we believe would not adversely affect client interests or the securities markets when conducting small transactions in largely capitalized/frequently traded securities. CVM and our personnel are not required to pre-clear the following types of transactions:

Equity Securities

The transaction is under \$10,000 and the security has a market capitalization of over \$2 billion and the security trades on the NYSE or other domestic exchange/financial market, including NASDAQ (excluding all options).

Exchange Traded Funds

The transaction is under \$10,000 and the security has an average daily trading volume of over one million shares and the security trades on the NYSE/AMEX or other domestic exchange/financial market, including NASDAQ.

Debt Securities

The bond purchase or sale is less than \$50,000 in principal amount per issuer.

As stated above, CVM and our personnel regularly purchase or sell securities for themselves that we also utilize for clients. As with client portfolios, allocations in our personal accounts are also made according to the individual accountholder's risk tolerance, current portfolio allocation, and personal financial

characteristics. This can result in better or worse performance in personal accounts depending on price movements in the positions we hold in common. Similarly, the level of participation by different clients in the same security sometimes varies dependent on personal risk tolerance and other factors relating to the suitability of the security for the particular client.

ITEM 12 - BROKERAGE PRACTICES

The Custodian and Brokers We Use

Clients must maintain assets in an account at a “qualified custodian,” generally a broker-dealer or bank. We require that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. CVM is independently owned and operated, and unaffiliated with Schwab. Schwab will hold client assets in a brokerage account and buy and sell securities when we instruct them to.

While we require that clients use Schwab as custodian/broker, the client must decide whether to do so and open accounts with Schwab by entering into account agreements directly with them. We do not open accounts for clients, although we generally assist them in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though clients maintain accounts at Schwab, we can still use other brokers to execute trades for client accounts (see ***Client Brokerage and Custody Costs***, below).

How We Select Brokers/Custodians

We seek to recommend a custodian/broker who will hold client assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

1. Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
2. Capability to execute, clear, and settle trades (buy and sell securities for client accounts)
3. Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
4. Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
5. Availability of investment research and tools that assist us in making investment decisions
6. Quality of services
7. Competitiveness of the price of those services (commission rates, other fees, etc.) and willingness to negotiate the prices
8. Reputation, financial strength, and stability
9. Prior service to CVM and our other clients
10. Availability of other products and services that benefit us, as discussed below (see ***Products and Services Available to Us from Schwab***)

Client Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge separately for custody services. However, Schwab receives compensation by charging commissions or other fees on trades that it executes or that settle into clients' Schwab accounts.

In addition to commissions, Schwab charges a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into a client's Schwab account. These fees are in addition to the commissions or other compensation the client pays the executing broker-dealer. Because of this, in order to minimize trading costs, we have Schwab execute most trades for client accounts. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see **How We Select Brokers/Custodians**).

Products and Services Available to Us from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide CVM and our clients with access to their institutional brokerage, trading, custody, reporting, and related services, many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts; others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (we do not have to request them) and at no charge to us.

Following is a more detailed description of Schwab's support services:

Services That Benefit Our Clients

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit our clients and their accounts.

Services That May Not Directly Benefit Our Clients

Schwab also makes available to us other products and services that benefit us but may not directly benefit our clients or their accounts. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

1. Provide access to client account data (such as duplicate trade confirmations and account statements)
2. Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
3. Provide pricing and other market data
4. Facilitate payment of our fees from our clients' accounts
5. Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

1. Educational conferences and events
2. Consulting on technology, compliance, legal, and business needs
3. Publications and conferences on practice management and business succession
4. Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions. We believe that our selection of Schwab as custodian and broker is in the best interests of our clients. CVM primarily supports our selection of Schwab by the scope, quality, and price of Schwab's services (see ***How We Select Brokers/Custodians***, above) and not Schwab's services that benefit only us.

Directed Brokerage

CVM does not allow clients to direct CVM to use a specific broker-dealer to execute transactions. Clients must use the broker-dealers that CVM requires to custody their account(s) to execute transactions. CVM makes an exception to this policy to honor prior agreements. Not all investment advisers require their clients to trade through specific brokerage firms. By requiring clients to use Schwab, CVM believes we may be able to more effectively manage the client's portfolio, achieve favorable execution of client transactions, and overall lower the costs to the portfolio.

Since we require most of our clients to maintain their accounts with Schwab, it is also important for clients to consider and compare the significant differences between having assets custodied at another broker-dealer, bank or other custodian prior to opening an account with us. Some of these differences include, but are not limited to total account costs, trading freedom, transaction fees/commission rates, and security and technology services.

Clients with 401(k) accounts are not required to use Schwab and may appoint a custodian of their choosing.

Aggregation and Allocation of Transactions

CVM generally aggregates orders for clients in the same securities in an effort to seek best execution, negotiate more favorable commission rates, and/or allocate differences in prices, commissions, and other transaction costs equitably among our clients. These are benefits of aggregating orders that we might not obtain if we placed those orders independently. Aggregating trades in like securities among client accounts as well as with accounts of CVM and our personnel presents a potential conflict of

interest as it could create an incentive to allocate more favorable executions to our own accounts or the accounts of our personnel.

Our policies to address this conflict are as follows:

1. We disclose our aggregation policies in this brochure;
2. We will not aggregate transactions unless we believe that aggregation is consistent with our duty to seek best execution (which includes the duty to seek best price) for our clients. The trade also needs to be consistent with the terms of our investment advisory agreement with each client that has an account included in the aggregation;
3. We will not favor any account over any other account. This includes accounts of CVM or any of our personnel. Each account in the aggregated order will participate at the average share price for all of our transactions in a given security on a given business day (per custodian). All accounts will pay their individual transaction costs;
4. Before entering an aggregated order, we will prepare a written statement (the "Allocation Statement") specifying the participating accounts and how we intend to allocate the order among those accounts;
5. If the aggregated order is filled entirely, we will allocate shares among clients according to the Allocation Statement; if the order is partially filled, we will allocate it based upon the following formula: for equities, clients' accounts will be filled in alphabetical order. Then, the next partial fill will begin in alphabetical order where the previous partial fill ended.
 - a. For fixed income, it will be allocated based upon the following considerations: each client's custom portfolio strategy, current and future financial needs, the account's asset allocation, diversification, tax considerations, levels of cash, and in addition to aggregated allocations there are individual accounts that may receive bonds:
 - i. these are newly opened accounts which may need to be invested;
 - ii. accounts within which fixed income securities have matured and need to be reinvested in newly purchased fixed income securities; and
 - iii. portfolios for individuals who have requested an increase in fixed income securities relative to the other holdings in their portfolios (i.e., a shift in asset allocation such as a reduction in equities or a desire to invest more of the currently-held cash into fixed income securities).
6. However, we may allocate the order differently than specified in the Allocation Statement if all client accounts receive fair and equitable treatment. (See also **Item 12 – Brokerage Practices** below.) In this case, we will explain the reasons for a different allocation in writing, which the CCO must approve no later than one hour after the opening of the markets on the trading day following the day the order was executed;
7. If an aggregated order is partially filled and we allocate it differently than the Allocation Statement specifies, no participating account may purchase or sell the security for a reasonable period following the execution of the block trade. This only applies when the participating

account sells or receives more shares than it would have if the aggregated order had been completely filled;

8. Our books and records will separately reflect each aggregated order and the securities held by, bought, and sold for each client account;
9. Funds and securities of clients participating in an aggregated order will be deposited with one or more qualified custodians. Clients' cash and securities will not be held collectively any longer than is necessary to settle the trade on a delivery versus payment basis. Following settlement, cash or securities held collectively for clients will be delivered out to the qualified custodian as soon as practical;
10. We do not receive additional compensation or remuneration of any kind as a result of aggregating orders; and
11. We will provide individual investment advice and treatment to each client's account.

ITEM 13 - REVIEW OF ACCOUNTS

Account Reviews

Investment Management Services

CVM seeks to meet client objectives by monitoring and rebalancing clients' investment portfolios on a regular basis. Frequency of portfolio reviews with clients is determined by both the individual client and CVM. These may be conducted quarterly, semi-annually, annually or at any other agreed interval. CVM may request more immediate reviews with our clients if we determine that special circumstances or material factors warrant additional attention.

Darren C. Pollock, David A. Horvitz, Managing Members, and/or James M. Whiting, Financial Advisor, internally review clients' investment portfolios on a regular basis, typically weekly, to evaluate whether security holdings, current market prices, and asset allocations conform to clients' investment policies. They may also internally review account holdings at any time changing market conditions warrant or by a client's request.

Financial Planning Services

Financial Plans are not reviewed beyond the initial scope of the plan. However, clients are encouraged to reach out to CVM at least annually and/or when they experience changes to their financial situation so that we can reevaluate the overall plan and determine whether changes are necessary.

Account Reporting

Investment Management Services

Each client receives a written statement from the custodian that includes an accounting of all holdings and transactions in the account for the reporting period. In addition, CVM provides written reports

detailing holdings of client accounts on a quarterly basis. CVM may also provide additional reporting as agreed upon by CVM and the client on a case-by-case basis.

Financial Planning Clients

Financial planning clients do not receive reports in addition to the initial financial plan.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Solicitors

If a solicitor introduces a client to CVM, we pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-1 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Solicitors will disclose the nature of the solicitor relationship with CVM at the time of the solicitation.

Schwab Support Products and Services

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see *Item 12 – Brokerage Practices*). We do not base particular investment advice, such as buying particular securities for our clients, on the availability of Schwab's products and services to us.

Outside Referrals

CVM may refer clients to unaffiliated professionals for specific needs, such as insurance, mortgage brokerage, real estate sales, and estate planning, legal, and/or tax/accounting services. In turn, these professionals may refer clients to CVM for advisory services. We do not have any agreements with individuals or companies that we refer clients to, and we do not receive any compensation for these referrals. However, it could be concluded that CVM is receiving an indirect economic benefit from the arrangement, as the relationships are mutually beneficial. For example, there could be an incentive for us to recommend services of firms who refer clients to CVM.

CVM only refers clients to professionals we believe are competent and qualified in their field, but it is ultimately the client's responsibility to evaluate the provider, and it is solely the client's decision whether to engage a recommended firm. Clients are under no obligation to purchase any products or services through these professionals, and CVM has no control over the services provided by another firm. Clients who choose to engage these professionals will sign a separate agreement with the other firm. Fees charged by the other firm are separate from and in addition to fees charged by CVM.

If the client desires, CVM will work with these professionals or the client's other advisors (such as an accountant or attorney) to help ensure that the provider understands the client's financial plan/investments and to coordinate services for the client. CVM does not share information with an unaffiliated professional unless first authorized by the client.

ITEM 15 - CUSTODY

CVM has limited custody of some of our clients' funds or securities when the clients authorize us to deduct our management fees directly from the client's account. A qualified custodian (generally a broker-dealer, bank, trust company, or other financial institution) holds clients' funds and securities. Clients will receive statements directly from their qualified custodian at least quarterly. The statements will reflect the client's funds and securities held with the qualified custodian as well as any transactions that occurred in the account, including the deduction of our fee.

CVM is also deemed to have custody of clients' funds or securities when clients have standing authorizations with their custodian to move money from a client's account to a third-party ("SLOA") and under that SLOA authorize us to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which we follow.

Clients should carefully review the account statements they receive from the qualified custodian. When clients receive statements from CVM as well as from the qualified custodian, they should compare these two reports carefully. Clients with any questions about their statements should contact us at the address or phone number on the cover of this brochure. Clients who do not receive a statement from their qualified custodian at least quarterly should also notify us.

ITEM 16 - INVESTMENT DISCRETION

CVM has full discretion to decide the specific security to trade, the quantity, and the timing of transactions for client accounts. CVM will not contact clients before placing trades in their account, but clients will receive confirmations directly from the broker for any trades placed. Clients grant us discretionary authority in the contracts they sign with us. Clients also give us trading authority within their accounts when they sign the custodian paperwork.

Certain client-imposed conditions may limit our discretionary authority, such as where the client prohibits transactions in specific security types. See also ***Tailored Services and Client Imposed Restrictions*** under ***Item 4***, above.

ITEM 17 - VOTING CLIENT SECURITIES

Proxy Voting

As a matter of policy and as a fiduciary to our clients who delegate proxy-voting authority to us, we have a responsibility to vote proxies consistent with the best economic interests of our clients. We maintain written policies and procedures as to the handling, research, voting, and reporting of proxy voting and make appropriate disclosures about our proxy policies and practices. Our policy and practice include the following responsibilities for the positions we manage: monitoring corporate actions, receiving and voting client proxies, and disclosing potential conflicts of interest, as well as making information available to clients about the voting of proxies for their portfolio securities managed by CVM and maintaining relevant and required records.

Voting Guidelines

1. We will vote proxies in the best interest of our clients. We will generally vote all proxies from a specific issuer the same way for each client. For those clients who delegate proxy voting authority to CVM, clients cannot direct how CVM should vote a particular solicitation;
2. We will generally vote in favor of routine corporate housekeeping proposals such as the election of directors and selection of auditors absent conflicts of interest raised by an auditor's non-audit services;
3. We will generally vote against management stock option plans and other management compensation issues over and above the normal compensation fixed by the board;
4. We will generally vote against staggered boards of directors, poison pills, and supermajority provisions;
5. In reviewing proposals, we will consider the opinion of management and the effect on management, and the effect on shareholder value and the issuer's business practices.

Conflicts of Interest

1. We will identify any conflicts that exist between our interests and the interests of the client by reviewing our relationship with the issuer of each security to determine if we or any of our employees has any financial, business or personal relationship with the issuer, other than as a passive investor holding a minority interest;
2. If a material conflict of interest exists, we will determine whether it is appropriate to disclose the conflict to the affected clients so as to give the clients an opportunity to vote the proxies themselves, or to address the voting issue through other objective means such as voting in a manner consistent with a predetermined voting policy or receiving an independent third-party voting recommendation; and
3. We will maintain a record of the voting resolution of any conflict of interest.

Any client may request a copy of CVM's complete proxy voting policy or a record of how we voted a proxy by contacting us by mail or phone.

Class Actions

CVM does not instruct or give advice to clients on whether or not to participate as a member of class action lawsuits and will not automatically file claims on the client's behalf. However, if a client notifies us that they wish to participate in a class action, we will provide the client with, to the best of our ability, any transaction information pertaining to the client's account needed for the client to file a proof of claim in a class action.

ITEM 18 - FINANCIAL INFORMATION

Registered investment advisers are required in this item to provide clients with certain financial information or disclosures about the firm's financial condition. Cheviot does not require the prepayment of more than \$1,200 in fees per client, six months or more in advance, and does not foresee any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

Form ADV, Part 2B Brochure Supplement

Darren C. Pollock
David A. Horvitz, CFP®
James M. Whiting, CFP®
Paul A. Matheson

Cheviot Value Management, LLC

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Suite 800
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February 23, 2024

This brochure supplement provides information about Darren C. Pollock, David A. Horvitz, James M. Whiting, and Paul Matheson that supplements the Cheviot Value Management, LLC brochure. You should have already received a copy of that brochure. Please contact us at the address or telephone number above, if you did not receive our brochure or if you have any questions about the contents of this supplement. Additional information about the above-named individuals is available on the SEC's website at www.adviserinfo.sec.gov.

DARREN C. POLLOCK

ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Darren C. Pollock, Portfolio Manager and Managing Member, b. 1975

Education:

Loyola Marymount University, Los Angeles, CA 1993-1997, BBA Finance

Business Background:

Darren C. Pollock joined Cheviot Value Management, LLC (formerly Cheviot Value Management, Inc.) as an Equity Analyst in 05/1998. Mr. Pollock became a Portfolio Manager of the firm in 07/2000 and acquired ownership as a Member in 01/2010. David A. Horvitz and Darren C. Pollock assumed control of the firm as Managing Members in January 2013 upon the founders' retirement.

ITEM 3 - DISCIPLINARY INFORMATION

Darren C. Pollock has no disciplinary history to disclose.

ITEM 4 - OTHER BUSINESS ACTIVITIES

Darren C. Pollock's only business is providing investment advice through Cheviot Value Management, LLC.

ITEM 5 - ADDITIONAL COMPENSATION

Darren C. Pollock's only compensation comes from his regular salary and ownership of Cheviot Value Management, LLC.

ITEM 6 - SUPERVISION

Darren C. Pollock and David A. Horvitz, Managing Members, are each Principals of CVM and jointly supervise firm activities and all personnel. They can each be reached by calling (310) 451-8600.

DAVID A. HORVITZ, CFP®

ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

David A. Horvitz, Financial Advisor and Managing Member, b. 1974

Education:

- Washington University, St. Louis, MO 1992-1996, BSBA Management
- Pepperdine University, Los Angeles, CA 1996-1998, MA Education
- Univ. of California, Los Angeles Extension, Los Angeles, CA 2005-2006, Certificate in Personal Financial Planning
- CFP®; CERTIFIED FINANCIAL PLANNER™, College for Financial Planning, 2006
- California Lutheran University, Thousand Oaks, CA 2008-2010, MBA

Business Background:

David A. Horvitz joined Cheviot Value Management, LLC (formerly Cheviot Value Management, Inc.) as a Financial Advisor in 07/2006 and acquired ownership as a Member in 01/2010. David A. Horvitz and Darren C. Pollock assumed control of the firm in January 2013 upon the founders' retirement. Mr. Horvitz also served as Chief Compliance Officer at CVM from January 2013 through May 2023. Prior to joining CVM, Mr. Horvitz was a teacher at Campbell Hall from 1996 to 2006.

Professional Designations

David A. Horvitz holds the following professional designation:

CERTIFIED FINANCIAL PLANNER™ professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.CFP.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.

- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3 - DISCIPLINARY INFORMATION

David A. Horvitz has no disciplinary history to disclose.

ITEM 4 - OTHER BUSINESS ACTIVITIES

David A. Horvitz’s only business is providing investment advice through Cheviot Value Management, LLC.

ITEM 5 - ADDITIONAL COMPENSATION

David A. Horvitz’s only compensation comes from his regular salary and ownership of Cheviot Value Management, LLC.

ITEM 6 - SUPERVISION

Darren C. Pollock and David A. Horvitz, Managing Members, are each Principals of CVM and jointly supervise firm activities and all personnel. They can each be reached by calling (310) 451-8600.

JAMES M. WHITING, CFP®

ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

James M. Whiting, Financial Advisor, Chief Compliance Officer, b. 1975

Education:

- Manhattan School of Music, New York, NY, BM, 1998
- Manhattan School of Music, New York, NY, MM, 2000
- CFP®; CERTIFIED FINANCIAL PLANNER™, College for Financial Planning, 2021

Business Background:

James joined Cheviot Value Management, LLC in February of 2018 as Financial Advisor, additionally serving as CVM's Chief Compliance Officer beginning in May of 2023. He brings to the team a unique background of experience in small business ownership, income real estate, education, administration, fundraising, and music. In the past, James has served as chair of Faculty Evaluation and Compensation from 2015-2017 at Campbell Hall, where he has also taught music and held various administrative duties since 2000. In 2007 and 2016, he has also founded two start-up companies in consumer communications and robotics.

Professional Designations

James M. Whiting holds the following professional designation:

CERTIFIED FINANCIAL PLANNER™ professional

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- Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.

- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

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Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3 - DISCIPLINARY INFORMATION

James M. Whiting has no disciplinary history to disclose.

ITEM 4 - OTHER BUSINESS ACTIVITIES

James M. Whiting’s only business is providing investment advice and compliance-related duties at Cheviot Value Management, LLC.

ITEM 5 - ADDITIONAL COMPENSATION

James M. Whiting’s compensation is based on a percentage of fees collected from the accounts he manages and salary compensation at Cheviot Value Management, LLC.

ITEM 6 - SUPERVISION

Darren C. Pollock and David A. Horvitz, Managing Members, are each Principals of CVM and jointly supervise firm activities and all personnel. They can each be reached by calling (310) 451-8600.

PAUL MATHESON

ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Paul A. Matheson, Financial Advisor, b. 1942

Education:

- University of California, Berkeley, Berkeley, CA, BA Economics/Political Science - 1964
- University of California, Berkeley, Berkeley, CA, MBA Finance - 1967
- Attended University of California, Los Angeles, Los Angeles, CA, completed coursework in PhD program – Finance, 1967-1969

Business Background:

- Cheviot Value Management, LLC, Financial Advisor, 10/2022 to present
- Wedbush Morgan Securities, Registered Representative, 03/2009 to 09/2022
- UBS Financial Services, Inc., Financial Advisor, 10/1976 to 03/2009

ITEM 3 - DISCIPLINARY INFORMATION

Paul A. Matheson has no disciplinary history to disclose.

ITEM 4 - OTHER BUSINESS ACTIVITIES

Paul A. Matheson's only business is providing investment advice through Cheviot Value Management, LLC.

ITEM 5 - ADDITIONAL COMPENSATION

Paul A. Matheson's compensation is based on a percentage of fees collected from the accounts he manages at Cheviot Value Management, LLC.

ITEM 6 - SUPERVISION

Darren C. Pollock and David A. Horvitz, Managing Members, are each Principals of CVM and jointly supervise firm activities and all personnel. They can each be reached by calling (310) 451-8600.

FACTS

WHAT DOES CHEVIOT VALUE MANAGEMENT, LLC DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and transaction history
- assets and risk tolerance

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Cheviot Value Management, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Cheviot Value Management, LLC share?	Can you limit this sharing?
For our everyday business purposes - as permitted by law	YES	NO
For our marketing purposes - to offer our products and services to you	NO	We Don't Share
For joint marketing with other financial companies	NO	We Don't Share
For our affiliates' everyday business purposes - information about your transactions and experiences	NO	We Don't Share
For our affiliates' everyday business purposes - information about your creditworthiness	NO	We Don't Share
For nonaffiliates to market to you	NO	We Don't Share

Questions?

Call (310) 451-8600 or go to www.cheviotvalue.com

WHO WE ARE

Who is providing this notice?	Cheviot Value Management, LLC
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WHAT WE DO

How does Cheviot Value Management, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Cheviot Value Management, LLC collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • seek advice about your investments • enter into an investment advisory contract • tell us about your investment or retirement portfolio • tell us about your investment or retirement earnings • give us your contact information <p>We also collect your personal information from other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes - information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

DEFINITIONS

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Cheviot Value Management, LLC has no affiliates</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • <i>Cheviot Value Management, LLC does not share with nonaffiliates so they can market to you</i>
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>Cheviot Value Management, LLC does not jointly market</i>