Introducing Creative Capital Management Investments LLC

Creative Capital Management Investments LLC ("CCMI LLC") provides financial and investment advisory services on a fee-only basis. We work with high net worth individuals, professionals, and owners of closely held businesses, retirement plans, and families in business addressing all aspects of their financial well-being. On a referral basis, we also work with individuals who have specific financial concerns, primarily in the areas of estate planning/estate settlement, tax planning, divorce settlements,inheritance, succession planning, retirement planning, and money management.

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

In the investment management service area, we manage clients' funds with long-term results in mind rather than short-term profits. The firm's investment professionals primarily utilize institutional class mutual funds, Exchange Traded Funds (ETFs), real estate investment trusts (REITs), bonds, and bank instruments. Each portfolio is designed to meet each client's personal investment objectives.

CCMI LLC offers personalized and responsive services to our clients. In addition, we subscribe to a written code of ethics that outlines standards of ethical conduct that govern our firm and all of its employees. Our code of ethics reflects the fiduciary standard under which we operate our firm in, that we are required to act in the best interest of our clients.

Creative Capital Management Investments LLC
Firm Brochure

Thank you for selecting Creative Capital Management Investments LLC as your financial advisory firm.

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

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

Our firm’s reputation has been built on trust *and, as we are held to a fiduciary standard,* we are required to act in the best interest of our clients. We believe this is the right and only way to conduct our business. We have worked diligently to earn our clients’ confidence. We want you to feel completely comfortable with the information presented in this brochure, so that a mutually beneficial relationship will result from our association. If you have any questions regarding our firm, the scope of services provided, or our fees,we encourage you to bring them to our attention at any time.

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

Item 1 Cover Page

Creative Capital Management Investments LLC
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(800) 615-6666 • www.myccmi.com
SEC File Number #801-110056

CCMI Firm Brochure

Dated January 30, 2024

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

References herein to Creative Capital Management Investments LLC as a "registered investment adviser" or anyreference being "registered" does not imply a certain level of skill or training.

Item 2 Material Changes

Since CCMI LLC filed its previous Form ADV Annual Amendment on September 20, 2023, this brochure has been materially amended throughout to reflect a new address for the home office of CCMI LLC and to reflect that CCMI now includes cash holdings for billing purposes.

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Item 4 Advisory Business

A. Creative Capital Management Investments LLC ("CCMI LLC") was formed on June 9, 2016 in the state of California and became registered as an investment adviser with the SEC in 2017, thereby continuing many of the client relationships established by its predecessor firm, Creative Capital Management, Inc., which was founded in 1980. CCMI LLC is owned 47.5% by JAMES Family Holdings, 47.5% by M. Ohana Holdings, and 5% by TKB Holdings Inc. JAMES Family Holdings is owned by Matt Showley, M. Ohana Holdings is owned by Brian Matter, and TKB Holdings Inc. is owned by Kim Benson. We are a fee only firm, which means our only compensation comes from clients andnot any other individuals or entities.

B. As discussed below, CCMI LLC offers investment advisory services to its clients, and, to the extent specifically requested by a client, financial planning and related consulting services.

INVESTMENT ADVISORY SERVICES

The client can decide to engage CCMI LLC to provide discretionary investment advisory services on a fee-only basis as discussed at Item 5 below. We manage our advisory accounts on a discretionary basis. This means that we make trades without discussing it with the client beforehand using the client's stated objectives to guide our actions. Before engaging CCMI LLC to provide investment advisory services, clients are generally required to enter into an *Investment Advisory Agreement* with CCMI LLC setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client. To commence the investment advisory process, CCMI LLC will ascertain each client's investment objective(s) and then allocate the client's assets consistent with the client's designated investment objective(s). Once allocated, CCMI LLC provides ongoing supervision of the account(s).

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent requested by a client, CCMI LLC may provide financial planning or consulting services (including investment and non-investment related matters, including estate, tax, and insurance planning,) on a stand-alone separate fee basis. Neither CCMI LLC, nor any of its representatives, serves as an attorney, accountant, or licensed insurance agent, and no portion of CCMI LLC's services should be construed as legal or accounting services. CCMI LLC may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any recommended professional. The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation from CCMI LLC. If the client engages any recommended professional, and a dispute arises, the client agrees to seek recourse exclusively from the engaged professional. It remains the client's responsibility to promptly notify CCMI LLC if there is ever any change in their financial situation or investment objectives so that CCMI LLC can review, and if necessary update its previous recommendations.

FINANCIAL PLANNING PROCESS

In order to introduce CCMI LLC to the client, review the client's personal financial or business planning needs, and determine the scope of services the client desires, this first appointment usually takes approximately one hour, for which

there may be no charge. Thereafter, CCMI LLC's normal hourly fee applies.

Prior to initiating any financial planning services for the client, in follow-up correspondence CCMI LLC will summarize the financial concerns discussed in the meeting and the fees required to complete the financial plan. CCMI requests an initial retainer fee from the client and provides the client with regulatory disclosures and agreements to begin the planning process. An outline of any additional data needed for the analysis will then be provided. Upon receipt of all of the additional data or information requested and the retainer fee, CCMI LLC will begin the work for the client's benefit. Once the plan or project is completed, the client will receive a final invoice detailing the work done by members of the CCMI LLC team and the balance of the fee due.

Once CCMI LLC has completed a preliminary summary focusing on the financial objectives, financial data and assumptions, and priorities the client develops and verifies with CCMI LLC's input, CCMI LLC will provide conclusions and recommendations to the client. CCMI LLC will review the recommendations with the client at the follow-up meeting and the client is free to implement any or all ofCCMI LLC's recommendations. The financial planning engagement is consideredcompleted when the client reviews the plan with CCMI LLC. Assistance with implementation items is available upon request on an hourly fee basis.

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

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

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

FIRST STEP **FINANCIAL PLANNING SERVICES**

First Step Financial Plan

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

The financial areas that are commonly addressed in a First Step Financial Plan include: properly allocating a company retirement plan, saving to buy a home, navigating the student loan repayment process, establishing a budget for ongoing expenses, learning to optimally allocate extra cash flow, planning for a child's college education, and establishing an estate plan or proper life insurance coverage. First Step Financial plans generally do not focus on retirement planning, but rather on optimizing the use of available funds over 10 or 15 years; specific retirement planning would need to be completed at a later time.

MISCELLANEOUS

Limitations of Financial Planning and Non-Investment Consulting and Implementation Services. When CCMI LLC provides financial planning and consulting services, including through its First Step Financial Plan offering, it can provide advice on investment and non-investment related matters, such as estate, tax, and insurance planning. CCMI LLC does not serve as a law firm, accounting firm, or insurance agency, and no portion of CCMI LLC's services should be construed as legal, accounting, or insurance advice requiring licensing. Accordingly, CCMI LLC does not prepare estate planning documents, tax returns or sell insurance products. To the extent requested by a client, CCMI LLC may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, and insurance agents). Clients are reminded that they are under no obligation to engage the services of any recommended professional. The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation made by CCMI LLC or its representatives: If the client engages any recommended professional, and a dispute arises, the client agrees to seek recourse exclusively from the engaged professional.

Unaffiliated Private Investment Funds. CCMI LLC also provides investment advice regarding private investment funds. CCMI LLC may manage private funds that clients may transfer into an account, but do not recommend that any clients consider an investment in private investment funds. Management of private investment funds is on a non-discretionary basis, as clients may be restricted as to when they can trim their positions given lock-up periods, and CCMI LLC cannot unilaterally decide to reduce or sell the position without the client's involvement. CCMI LLC's role relative to unaffiliated private investment funds shall be limited to non-discretionary management of private investment funds transferred into a CCMI LLC-managed account by a client, in accordance with the terms and conditions of the fund documents. If a client determines to become an unaffiliated private fund investor, the amount of assets invested in the fund(s) shall be included as part of "assets under management" for purposes of CCMI LLC calculating its investment advisory fee. CCMI LLC's fee shall be in addition to the fund's fees. CCMI LLC's clients are under absolutely no obligation to consider or make an investment in any private investment fund(s).

> **Please Note:** Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. Unlike liquid investments that a client may own, private investment funds do not provide daily liquidity or pricing. Each prospective client investor will be required to complete a Subscription Agreement, pursuant to which the client shall establish that

the client is qualified for investment in the fund, and acknowledges and accepts the various risk factors that are associated with such an investment.

Please Also Note: **Valuation**. In the event that CCMI LLC references private investment funds owned by the client on any supplemental account reports prepared by CCMI LLC, the value(s) for all private investment funds owned by the client shall reflect the most recent valuation provided by the fund sponsor. However, if subsequent to purchase, the fund has not provided an updated valuation, the valuation shall reflect the initial purchase price. If subsequent to purchase, the fund provides an updated valuation, then the statement will reflect that updated value. The updated value will continue to be reflected on the report until the fund provides a further updated value. **Please Also Note**: As result of the valuation process, if the valuation reflects initial purchase price or an updated value subsequent to purchase price, the current value(s) of an investor's fund holding(s) could be significantly more or less than the value reflected on the report. Unless otherwise indicated, CCMI LLC shall calculate its fee based upon the latest value provided by the fund sponsor.

Retirement Rollovers. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If the CCMI LLC recommends that a client roll over their retirement plan assets into an account to be managed by CCMI LLC, such a recommendation creates a conflict of interest if CCMI LLC will earn new (or increase its current) compensation as a result of the rollover. Whether CCMI LLC provides a recommendation as to whether a client should engage in a rollover or not, CCMI LLC is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. No client is under any obligation to roll over retirement plan assets to an account managed by CCMI LLC. CCMI LLC's Chief Compliance Officer, Brian Matter, remains available to address any questions that a client or prospective client may have regarding thepotential for conflict of interest presented by a rollover recommendation.

Other Assets. A client may:

- hold securities that were purchased at the request of the client or acquired prior to the client's engagement of CCMI LLC. Generally, with potential exceptions, CCMI LLC does not/would not recommend nor follow such securities, and absent mitigating tax consequences or client direction to the contrary, would prefer to liquidate such securities. **Please Note**: If/when liquidated, it should not be assumed that the replacement securities purchased by CCMI LLC will outperform the liquidated positions. To the contrary, different types of investments involve varying degrees of risk, and there can be no assurance that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by CCMI LLC) will be

profitable or equal any specific performance level(s)In addition, there may be other securities and/or accounts owned by the client for which CCMI LLC does not maintain custodian access and/or trading authority; and,

- hold other securities and/or own accounts for which CCMI LLC does not maintain custodian access and/or trading authority.

Socially Responsible (ESG) Investing Limitations. ***Socially Responsible Investing*** involves the incorporation of **Environmental**, **Social** and **Governance** ("ESG") considerations into the investment due diligence process. ESG investing incorporates a set of criteria/factors used in evaluating potential investments: Environmental (i.e., considers how a company safeguards the environment); Social (i.e., the manner in which a company manages relationships with its employees, customers, and the communities in which it operates); and Governance (i.e., company management considerations). The number of companies that meet an acceptable ESG mandate can be limited when compared to those that do not, and could underperform broad market indices. Investors must accept these limitations, including potential for underperformance. As with any type of investment (including any investment and/or investment strategies recommended and/or undertaken by Registrant), there can be no assurance that investment in ESG securities or funds will be profitable, or prove successful. CCMI LLC does not maintain or advocate an ESG investment strategy, but will seek to employ ESG if directed by a client to do so. If implemented, Registrant shall rely upon the assessments undertaken by the unaffiliated mutual fund, exchange traded fund or separate account manager to determine that the fund's or portfolio's underlying company securities meet a socially responsible mandate.

WE DON'T RECOMMEND Cryptocurrency: For clients who want exposure to cryptocurrencies, including Bitcoin, CCMI LLC, will advise the client to consider a potential investment in corresponding exchange traded securities, or an allocation to separate account managers and/or private funds that provide cryptocurrency exposure. Crypto is a digital currency that can be used to buy goods and services but uses an online ledger with strong cryptography (i.e., a method of protecting information and communications through the use of codes) to secure online transactions. Unlike conventional currencies issued by a monetary authority, cryptocurrencies are generally not controlled or regulated, and their price is determined by the supply and demand of their market. Because cryptocurrency is currently considered to be a speculative investment, CCMI LLC will not exercise discretionary authority to purchase a cryptocurrency investment for client accounts. Rather, a client must expressly authorize the purchase of the cryptocurrency investment. **Please Note**: CCMI LLC **does not** recommend or advocate the purchase of, or investment in, cryptocurrencies. CCMI LLC considers such an investment to be **speculative. Please Also Note**: Clients who authorize the purchase of a cryptocurrency investment must be prepared for the potential for **liquidity constraints, extreme price volatility and complete loss of principal.**

Client Retirement Plan Assets. If requested to do so, CCMI LLC can provide investment advisory services relative to 401(k) plan assets or other retirement plan assets (i.e., 403(b), 457, etc.) maintained by the client in conjunction with the retirement plan established by the client's employer. In such event, CCMI LLC shall allocate (or recommend that the client allocate) the retirement account

assets among the investment options available on the 401(k) (or other retirement plan) platform. Registrant's ability shall be limited to the allocation of the assets among the investment alternatives available through the plan. CCMI LLC will not receive any communications from the plan sponsor, custodian, or other institution or firm, and it shall remain the client's exclusive obligation to notify CCMI LLC of any changes in investment alternatives, restrictions, etc. pertaining to the retirement account. Unless expressly indicated by CCMI LLC to the contrary, in writing, the client's 401(k) (or other retirement account(s)) plan assets shall be included as assets under management for purposes of CCMI LLC calculating its advisory fee.

Independent Managers. CCMI LLC may allocate a portion of a client's investment assets to unaffiliated independent investment managers (each an "Independent Manager") in accordance with the client's designated investment objectives. The Independent Manager will have day-to-day responsibility for the active discretionary management of the allocated assets. CCMI LLC will continue to monitor and review the client's account performance, asset allocation and investment objectives. The factors CCMI LLC considers in recommending Independent Managers includes the client's investment objectives, and the manager's management style, performance, reputation, financial strength, reporting, research and pricing. Registrant defines "Independent Managers" to primarily include separately managed accounts. Currently, an independent manager is being used for one asset class, municipal bonds, but may determine to use another independent manager at some point in the future. The investment management fee charged by the Independent Manager[s] is separate from, and in addition to, CCMI LLC's investment advisory fee disclosed at Item 5 below.

Reporting Services. CCMI LLC can also provide account reporting services, which can incorporate client investment assets that are not part of the assets that CCMI LLC manages (the "Excluded Assets"). Unless agreed to otherwise, in writing, **the client and/or his/her/its other advisors that maintain trading authority, and not CCMI LLC, shall be exclusively responsible for the investment performance of the Excluded Assets**. Unless also agreed to otherwise, in writing, CCMI LLC does not provide investment management, monitoring or implementation services for the Excluded Assets. If CCMI LLC is asked to make a recommendation as to any Excluded Assets, the client is under absolutely no obligation to accept the recommendation, and CCMI LLC shall not be responsible for any implementation error (timing, trading, etc.) relative to the Excluded Assets. The client can engage CCMI LLC to provide investment management services for the Excluded Assets pursuant to the terms and conditions of the *Investment Advisory Agreement* between CCMI LLC and the client.

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

Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment

or investment strategy (including the investments and/or investment strategies recommended or undertaken by CCMI LLC) will be profitable or equal any specific performance level(s).

Cybersecurity Risk. The information technology systems and networks that CCMI LLC and its third-party service providers use to provide services to CCMI LLC's clients employ various controls, which are designed to prevent cybersecurity incidents stemming from intentional or unintentional actions that could cause significant interruptions in CCMI LLC's operations and result in the unauthorized acquisition or use of clients' confidential or non-public personal information. Clients and CCMI LLC are nonetheless subject to the risk of cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damage to respond to regulatory obligations, other costs associated with corrective measures, and loss from damage or interruption to systems. Although CCMI LLC has established its systems to reduce the risk of cybersecurity incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that CCMI LLC does not directly control the cybersecurity measures and policies employed by third-party service providers. Clients could incur similar adverse consequences resulting from cybersecurity incidents that more directly affect issuers of securities in which those clients invest, broker-dealers, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions.

C. CCMI LLC provides investment advisory services specific to the needs of each client. Prior to providing services, an investment adviser representative will determine each client's investment objectives. Thereafter, CCMI LLC shall invest or recommend that the client invest their assets consistent with their investment objectives. The client may, at any time, impose reasonable restrictions, in writing, on CCMI LLC's services.

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

E. As of December 31, 2023, CCMI LLC had $585,544,223 in assets under management on a discretionary basis and $601,633 in assets under management on a non-discretionary basis.

Item 5 Fees and Compensation

INVESTMENT ADVISORY SERVICES

CCMI's annual investment advisory fee is based on a percentage (%) of the market value of the assets placed under CCMI LLC's management. The current annual fee for CCMI LLC investment advisory services is billed in arrears in quarterly installments based on the average daily balance of the portfolio per quarter as follows:

1.0% of assets valued between $0 and $1 million
0.80% of assets valued between $1,000,001 and $2 million
0.60% of assets valued between $2,000,001 and $3 million
0.40% of assets in excess of $3 million

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

Cash Positions. CCMI LLC treats cash as an asset class. As such, unless determined to the contrary by CCMI LLC, all cash positions (money markets, etc.) shall be included as part of assets under management for purposes of calculating CCMI LLC's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being **no guarantee** that such anticipated market conditions/events will occur), CCMI LLC may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, CCMI LLC's advisory fee could exceed the interest paid by the client's money market fund.

When a managed portfolio is established, the first quarterly investment advisory fee will be billed at the end of the first quarter and will be prorated for the time the funds were under CCMI LLC's direction based on the average daily balance during the quarter. CCMI reserves the right to charge a portfolio setup fee. In the event that the client is subject to portfolio setup fee, the client could pay a higher percentage fee than referenced above, in the period that the setup fee is charged.

The ideal minimum portfolio size at CCMI LLC is $500,000; however, depending on the relationship the client or their family has with the firm, smaller portfolios maybe accommodated on a specialized basis. CCMI LLC may, but is not required to, include one or more related families for the purposes of determining advisory fees (often referred to as "householding"). CCMI LLC is under no obligation to household any client accounts. CCMI LLC shall generally price its advisory services based upon various objective and subjective factors. As a result, our clients could pay diverse fees based upon the type, amount and market value of their assets, the anticipated complexity of the engagement, the anticipated level and scope of the overall investment advisory services to be rendered. Additionally, CCMI LLC, in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts or households, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). **Please Note**: As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS**: CCMI LLC's Chief Compliance Officer, Brian Matter, remains available to address any questions that a client or prospective client may have regarding advisory fees.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

For Investment Advisory clients with liquid assets in excess of $3 million, Financial Planning services are provided to the client for no additional fee. For all other clients, CCMI LLC's planning and consulting fees are negotiable, but generally range from $1,500 to $10,000, depending on the number of hours involved. Hourly fees range from $85 to $275 depending upon the level and scope of the

services required and the professional rendering the services. Prior to engaging CCMI LLC to provide financial planning or consulting services, clients are required to sign a *Financial Planning and Consulting Agreement* with CCMI LLC setting forth the terms and conditions of the engagement and the portion of the fee that is due from the client prior to CCMI LLC commencing services.

FIRST STEP FINANCIAL PLANNING SERVICES

The fee for a First Step Financial Plan generally ranges from $1,500 to $3,500, and an initial retainer will be requested from the client before any work is performed for the client's benefit. The remainder of the fee will be billed upon completion of the plan. The fee includes time spent in a meeting with a CCMI LLC team member, reviewing the recommendations and possible alternative solutions and reviewing the completed planning work. The client may choose not to have a review meeting conducted; however, the balance of the financial planning fee will be billed at the completion of the plan.

Margin Accounts and Securities-Based Loans

A client who has a need to borrow money could determine to do so by using:

- **Margin** -The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money, and uses the assets in the client's brokerage account as collateral.
- **Pledged Assets Loan**- In consideration for a lender (i.e., a bank, etc.) to make a loan to the client, the client pledges its investment assets held at the account custodian as collateral.

These above-described collateralized loans are generally utilized because they typically provide more favorable interest rates than standard commercial loans. These types of collateralized loans can assist with a pending home purchase, permit the retirement of more expensive debt, or enable borrowing in lieu of liquidating existing account positions and incurring capital gains taxes. However, such loans are not without potential material risk to the client's investment assets. The lender (i.e. custodian, bank, etc.) will have recourse against the client's investment assets in the event of loan default or if the assets fall below a certain level. For this reason, CCMI LLC does not recommend such borrowing unless it is for specific short-term purposes (i.e. a bridge loan to purchase a new residence). CCMI LLC does not recommend such borrowing for investment purposes (i.e. to invest borrowed funds in the market). Regardless, if the client was to determine to utilize margin or a pledged assets loan, the following economic benefits would inure to CCMI LLC:

- by taking the loan rather than liquidating assets in the client's account, CCMI LLC continues to earn a fee on such Account assets; and,
- if the client invests any portion of the loan proceeds in an account to be managed by CCMI LLC, CCMI LLC will receive an advisory fee on the invested amount; and,
- if CCMI LLC's advisory fee is based upon the higher margined account value, CCMI LLC will earn a correspondingly higher advisory fee. This could provide CCMI LLC with a disincentive to encourage the client to discontinue the use of margin.

Please Note: The Client must accept the above risks and potential corresponding consequences associated with the use of margin or a pledged assets loans.

A. Clients may elect to have CCMI LLC's advisory fees deducted from their custodial account. Both CCMI LLC's *Investment Advisory Agreement* and the custodial/clearing agreement may authorize the custodian to debit the client's account(s) for the amount of CCMI LLC's investment advisory fee and to directly remit that management fee to CCMI LLC in compliance with regulatory procedures.In the limited event that CCMI LLC bills the client directly, payment is due upon receipt of CCMI LLC's invoice. CCMI LLC shall deduct fees and/or bill clients quarterly, in arrears, based upon the average daily market value of the assets on the last business day of the previous quarter. Oftentimes, clients own more than one account that are managed by CCMI LLC. In those cases, CCMI LLC may deduct its fee from any account under its management when determined necessary or appropriate. For example, CCMI LLC may not have authority to deduct its fee from certain accounts held at a custodian other than *Schwab* and may instead deduct all of its fees owed from an account held at *Schwab*.

B. Unless the client directs otherwise or an individual client's circumstances require, CCMI LLC generally recommends that *Schwab* serve as the broker- dealer / custodian for client investment management assets. Broker-dealers such as *Schwab* charge brokerage commissions and transaction fees for effecting securities transactions (e.g. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition, client accounts may invest in mutual funds (including money market funds) and ETFs that have various internal fees and expenses (i.e. management fees), which are paid by these funds but ultimately borne by clients as a fund shareholder. These internal fees and expenses are in addition to the fees charged by CCMI LLC. Clients may also incur additional fees charged by Independent Managers as more fully described in Item 4 above.

C. CCMI LLC's annual investment advisory fee shall be prorated and paid quarterly, in arrears, based upon the average daily market value of the assets of the portfolio during the previous quarter. If an independent manager is used, the investment management fees for the independent managers will be billed quarterly, either in advance of the quarter or in arrears, depending on the billing procedure of the independent manager. While CCMI LLC doesn't generally have a minimum annual fee, as noted above, we prefer working with households with more than $500,000; however, depending on the relationship the client or their family has with the firm, smaller portfolios can be accommodated on a specialized basis.

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

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

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

CCMI LLC is not a party to any performance or incentive-related compensation arrangements with its clients.

Item 7 Types of Clients

CCMI LLC's clients generally include individuals, pension and profit sharing plans, business entities, trusts, and estates. Item 5 above contains additional information about CCMI LLC's minimum fees and account minimums. CCMI LLC shall generally price its advisory services based upon various objective and subjective factors. As a result, our clients could pay diverse fees based upon the type, amount and market value of their assets, the anticipated complexity of the engagement, the anticipated level and scope of the overall investment advisory services to be rendered. Additionally, CCMI LLC, in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts or households, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). **Please Note**: As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS**: CCMI LLC's Chief Compliance Officer, Brian Matter, remains available to address any questions that a client or prospective client may have regarding advisory fees.

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

A. Methods of Analysis

At CCMI, we are guided by the following investment principles and beliefs:

1. Markets are efficient: Security prices reflect available information.
2. Structure determines performance: Asset allocation along with size, value and market exposure primarily determine the results of a broadly diversified portfolio.
3. Risk and return are related: Exposure to meaningful risk factors determines expected return.
4. Diversification is essential: Diversification reduces uncertainty; concentrated investments add risk with no additional expected return.
5. Costs and taxes matter: Expenses and taxes reduce net returns.

Recommendations for our purchases of investments are based on publicly available reports and analysis. We utilize many sources of public information including financial news and research materials. CCMI may utilize the following methods of security analysis:

- Fundamental - analysis performed on historical and present data, with the goal of making financial forecasts
- Technical – analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices

One of the prime basis of our investment approach is Modern Portfolio Theory. We

also respect a variety of well-known studies focusing on efficient markets, the long-term performance histories of value stocks versus growth stocks, small capitalization stocks versus large capitalization stocks, and passive versus active management.

We objectively attempt to apply this historical and ongoing research to construct portfolios for relative and absolute performance. More importantly, each client's portfolio is designed to meet that client's stated objectives.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by CCMI LLC) will be profitable or equal any specific performance level(s). Investing in securities involves risk of loss that clients should be prepared to bear.

B. Investment Strategies

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

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

- Long-Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Periodically rebalancing a portfolio due to a major change in economic conditions or a change in asset classes selected by the CCMI advisors. Wide latitude is given to rebalancing, as taxes and transaction costs influence the decisions made.

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

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

C. Risk of Loss.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy

(including the investments and/or investment strategies recommended or undertaken by CCMI) will be profitable or equal any specific performance level(s).

Our investment approach keeps the risk of loss in mind. Investors face several investment risks which include:

- Business Risk: These risks are associated with a particular industry or a particular company within an industry.
- Cash Positions: CCMI LLC treats cash as an asset class. As such, unless determined to the contrary by CCMI LLC, all cash positions (money markets, etc.) shall be included as part of assets under management for purposes of calculating CCMI LLC's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being **no guarantee** that such anticipated market conditions/events will occur), CCMI LLC may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, CCMI LLC's advisory fee could exceed the interest paid by the client's money market fund. A client can advise CCMI LLC not to maintain (or to limit the amount of) cash holdings in the client's account.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Interest Rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate.
- Investment Company (including ETF) Risk: Investments in investment companies, such as ETFs and mutual funds, involves the duplication or layering of advisory fees and certain other expenses. Investment company shareholders bear the fund's proportionate share of the fees and expenses in connection with the fund's own operations, and indirectly the fees and expenses of any underlying investment, which may include other investment companies. If the investment company or ETF fails to achieve its investment objective, the value of the fund's investment will decline, adversely affecting the fund's performance. In addition, ETF shares potentially may trade at a discount or a premium and are subject to brokerage and other trading costs, which could result in greater expenses to the fund. In addition, most mutual funds and ETFs are available directly to the public. You can obtain many of the mutual funds and ETFs used by CCMI LLC without engaging CCMI LLC. However, you will not receive CCMI LLC's initial and ongoing investment advisory services. Other mutual funds, such as those issued by Dimensional Fund Advisors ("DFA"), are generally only available through registered investment advisers. CCMI LLC may invest in DFA mutual funds. If a client terminates CCMI LLC, restrictions regarding the transfer and additional purchase of, or reallocation among DFA funds will apply. Clients selling their DFA mutual funds may be subject to tax consequences.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in

a standardized product.

- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances.
- Portfolio Inactivity: CCMI LLC reviews client portfolios on a quarterly basis as described in greater detail in Item 13 below. Depending on the results of those reviews, CCMI may determine that changes to a client's portfolio is unnecessary. CCMI will continue to charge its advisory fees described in Item 5 above regardless of the level of trading in the client's account.
- REITs: REITs are subject to risks generally associated with investing in real estate, such as: possible declines in the value of real estate; adverse general and local economic conditions; possible lack of availability of mortgage funds; changes in interest rates; and environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.
- Reinvestment Risk: This is the risk that future proceeds from investments – primarily fixed income securities – may have to be reinvested at a potentially lower rate of return (i.e. interest rate).

Item 9 Disciplinary Information

CCMI LLC has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

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

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

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

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

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

A. CCMI LLC has a fiduciary obligation to place our clients' interests above those of the advisory firm and disclose instances where it might be conflicted. CCMI LLC maintains a Policies and Procedures manual which contains an overall Code of Ethics, which serves to establish a standard of business conduct for all of CCMI LLC's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

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

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

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

   CCMI LLC has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of CCMI LLC's "Access Persons". CCMI LLC's securities transaction policy requires that an Access Person of CCMI LLC must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, the Chief Compliance Officer will generate a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date CCMI LLC selects.

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

Item 12 Brokerage Practices

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

designated broker-dealer/custodian.

Factors that CCMI LLC considers in recommending *Schwab* (or any other broker-dealer/custodian to clients) include historical relationship with CCMI LLC, financial strength, reputation, execution capabilities, pricing, research, and service. Broker-dealers such as Schwab can charge transaction fees for effecting certain securities transactions (***See*** Item 4 above). To the extent that a transaction fee will be payable by the client to Schwab, the transaction fee shall be in addition to CCMI LLC's investment advisory fee referenced in Item 5 above.

To the extent that a transaction fee is payable, CCMI LLC shall have a duty to obtain best execution for such transaction. However, that does not mean that the client will not pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where CCMI LLC determines, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, transaction rates, and responsiveness. Accordingly, although CCMI LLC will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions.

1. Research and Additional Benefits
   Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, CCMI LLC can receive from Schwab (or another broker-dealer/custodian, investment manager, platform sponsor, mutual fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist CCMI LLC to better monitor and service client accounts maintained at such institutions.

   CCMI LLC's clients do not pay more for investment transactions executed or assets maintained at Schwab or other broker-dealers and custodians because of these arrangements. There is no corresponding commitment made by CCMI LLC to any broker-dealer or custodian or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products because of the above arrangements.

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

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

3. CCMI LLC CCMI LLC recommends that its clients utilize the brokerage and custodial services provided by Schwab. The Firm generally does not accept directed brokerage arrangements (but could make exceptions). A directed brokerage arrangement arises when a client requires that account transactions be effected through a specific broker-dealer/custodian, other than one generally recommended by CCMI LLC (i.e., Schwab). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Firm will not seek better execution

services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by CCMI LLC. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

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

Higher transaction costs adversely impact account performance. Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

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

B. Transactions for each client account generally will be effected independently unless Firm decides to purchase or sell the same securities for several clients at approximately the same time. The Firm may (but is not obligated to) combine or "batch" such orders for individual equity transactions (including ETFs) with the intention to obtain better price execution, to negotiate more favorable commission rates, or to allocate more equitably among the Firm's clients differences in prices and commissions or other transaction costs that might have occurred had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. CCMI LLC does not receive any additional payments as a result of any order aggregation.

Item 13 Review of Accounts

A. For those clients to whom CCMI LLC provides investment supervisory services, account reviews are conducted periodically by CCMI LLC's Managing Members and/or representatives. CCMI generally reviews accounts for rebalancing on a quarterly basis but may adjust the timing depending on the portfolios structure or client needs. All investment supervisory clients are advised that it remains their responsibility to advise CCMI LLC of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with CCMI LLC on an annual basis.

B. CCMI LLC may conduct additional account reviews within other time frames, because of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

C. Clients are provided, monthly or quarterly statements with written transaction

confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. CCMI LLC also provides a written periodic report summarizing account activity and performance.

Item 14 Client Referrals and Other Compensation

A. As referenced in Item 12 above, CCMI LLC can receive from Schwab (and others) without cost (and/or at a discount), support services and/or products. CCMI LLC's clients do not pay more for investment transactions effected and/or assets maintained at Schwab (or any other institution) as result of this arrangement. There is no corresponding commitment made by CCMI LLC to Schwab, or to any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as the result of the above arrangement.

B. CCMI LLC does not maintain promoter arrangements/pay referral fee compensation to non-employees for new client introductions. At CCMI LLCs discretion, a charitable gift of up to $50 may be made directly to a charity in honor of a referral source, one time per referral. This is done as a thank you for the referral, and the non-supervised person does not receive any direct benefit from the charitable donation.

Item 15 Custody

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

Clients are urged to compare reports provided by CCMI LLC with the account statements received from the account custodian. The account custodian does not verify the accuracy of CCMI LLC's advisory fee calculation.

CCMI LLC may also be deemed to have custody of certain non-Schwab client accounts because of the services it provides to these accounts. CCMI LLC maintains usernames and passwords of certain "held away" accounts to advise clients regarding these holdings. The client accounts for which CCMI LLC is deemed to have custody are subjected to an annual, independent verification in accordance with Rule 206(4)-2 under the Investment Advisers Act of 1940.

Item 16 Investment Discretion

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

discretionary account.

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

Item 17 Voting Client Securities

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

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

Item 18 Financial Information

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

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

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

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

Creative Capital Management Investments LLC

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(800) 615-6666 • www.myccmi.com

CCMI Firm Brochure Supplement
Dated January 29, 2024

This brochure supplement provides information about the CCMI LLC Advisory Team Members which supplements the Creative Capital Management Investments LLC firm brochure. You should have received a copy of that brochure. Please contact Brian Matter, Chief Compliance Officer, if you did not receive Creative Capital Management Investments LLC brochure or if you have any questions about the contents of this supplement.

Additional information about the CCMI Advisory Team Members is available on the SEC's website at www.adviserinfo.sec.gov.

Advisory Team Members
Matthew B. Showley, CFP®, AEP®, Brian W. Matter, CFP®, CPWA®, CEPA,
Kimberly M. Benson, CFP®, CPA, CeFT®, and Tina Vieregg, CFP®, BFA™

Education and Business Standards

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

- Have prior experience in financial planning, investment advisory experience, or business consulting experience;
- Pass the CFP® examination within three years of employment;
- Complete a minimum of thirty (30) hours of continuing education during each calendar year;
- Attend the firm's monthly investment management meetings;
- Stay current with professional reading, research, and other forms of pertinent information that relate to CCMI LLC clients' portfolios and financial planning strategies; and
- Comply with our firm's code of ethics, which states that we have a fiduciary duty to always place the interests of the clients ahead of our own interests and that of the firm.

Professional Certifications

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

CERTIFIED FINANCIAL PLANNER™
Professionals at our Firm are certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, they may refer to themselves 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.

- **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.

CERTIFIED PUBLIC ACCOUNTANT ("CPA")

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience, and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credithours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax, or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education ("CPE") each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants ("AICPA") members are required to follow a

rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the clientany commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

In addition to the *Code of Professional Conduct*, AICPA members who provide personal financial planning services are required to follow the *Statement on Standards in Personal Financial Planning Services* (SSPFPS).

Certified Private Wealth Advisor® ("CPWA®")
Certified Private Wealth Advisor® certification is an advanced education and voluntary standard for advisors who serve high-net-worth clients offered by the Investments and Wealth Management Institute. The CPWA® program takes a holistic and multidisciplinary approach to provide advanced knowledge and techniques that address the sophisticated needs of clients with a minimum net worth of $5 million.

To earn a CPWA® certification an advisor must (1) submit an application and pass a comprehensive background check; (2) complete the education requirement through a registered education program; (3) pass the Certification Examination; and (4) complete a license agreement and agree to adhere to the Institute's *Code of Professional Responsibility* and *Rules and Guidelines for the Use of the Marks.* To maintain a CPWA® certification, an advisor must complete a minimum of 40 hours of continuing education credit, including two hours related to ethics and one related to taxes and regulation.

Accredited Estate Planner® ("AEP")
To receive the Accredited Estate Planner® designation from the National Association of Estate Planners & Councils, recipients are required to spend at least one-third of their time on estate planning and related matters, actively participate for a minimum of five years in a discipline such which includes financial planning, hold a professional credential, obtain three professional references from individuals whom you have worked with on estate planning cases and be a current member in an affiliated local estate planning council. Additional coursework is required for applicants with 5 to 15 years of experience.

Certified Exit Planning Advisor ("CEPA")
The CEPA designation is offered by the Exit Planning Institute. The CEPA designation is an advanced education program which trains and certifies qualified professional advisors in the field of exit planning. The coursework focuses on helping business owners build value in their business and assisting them in the exit planning process.

To earn the CEPA designation, a candidate must have five years of full time experience working in a business such as financial planning, hold an undergraduate degree from a qualifying institution, take an educational program and pass a final exam. To maintain a CEPA certification, an advisor must complete a minimum of 40 hours of continuing education credit every three years.

Behavioral Financial Advisor ("BFA™")
Behavioral Financial Advisor combines psychology and neuroscience with traditional financial practices. The BFA curriculum is designed to equip advisors with tools and training

to further help their clients make sound financial decisions, maintain emotional competency and achieve their financial goals.

To earn the BFA™ designation, a candidate must complete coursework and pass a final exam. To maintain the BFA™ designation, an advisor must complete a minimum of 20 hours of continuing education credit every two years.

Certified Financial Transitionist (CeFT®)
The Certified Financial Transitionist designation is issued by the Financial Transitionist® Institute. The designation was introduced in 2014 and requires two years of training focused on cutting-edge research from neuroscience, physiology, sociology and psychology to help guide clients through life's transitions.

CeFT practitioners have a deep and abiding understanding of how people individually experience change, especially transitions that impact wealth, such as business ownership changes, retirement, divorce, death, or marriage. The certification requires adherence to the Code of Ethics for Financial Transitionists® and being in good standing with our primary designation.

To earn the CeFT® designation, a candidate must have at least five years of direct client service experience and hold an underlying designation, such as the Certified Financial Planner™ designation. Other qualifying designations include CIMA, ChFC, CDFA, CPWA, CPA/PFS, CFA. Completion of a 12-month core training program and a final exam is required. To maintain the CeFT® designation, an advisor must complete at least 15 hours of continuing education per year.

Matthew B. Showley "Matt", CFP®, AEP®, Principal

Educational Background:
Matt was born in 1980. He graduated from Francis Parker High School in 1998. Matt graduated from Pepperdine University with a Bachelor of Science in Business Administration in 2002. In 2006, he earned a Master of Business Administration (MBA) in Finance and Real Estate from the University of San Diego. Matt also earned his graduate certificate in Financial and Tax Planning from San Diego State University in 2008. Matt earned his official CERTIFIED FINANCIAL PLANNER™ designation in June 2009 and his Accredited Estate Planner® designation in 2020.

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

Matt joined CCMI, the predecessor firm to CCMI LLC, in 2006 as an Investment Associate. Matt began advising clients directly in the areas of Investment Management and Financial Planning upon becoming a CFP® practitioner in 2009. He has significantly streamlined the CCMI investment management and financial planning processes, company operations, implemented new software systems, and has served on the Investment Committee guiding client portfolio strategies since

that time.

Matt is a member of the national and local chapters of the Financial Planning Association and the National Association of Personal Financial Advisors. Matt also serves on the board of the Estate Planning Council of San Diego, the Scripps Health Foundation Gift Planning Advisory Board, and a board member at Junior Achievement San Diego. Matt previously served as a founding board member of Empower Language Academy Charter School in San Diego. Additionally, Matt is a graduate of LEAD San Diego's IMPACT program (2013).

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

Disciplinary Information:
None

Other Professional Activities:
Financial Planning Association National and San Diego Chapters (Member), National Association of Personal Financial Advisors (Member), Estate Planning Council of San Diego (Past-President), Junior Achievement San Diego (Board Member), LEAD San Diego Graduate, Vistage (Member)

Additional Compensation:
Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI LLC, its principals, and employees.

Supervision:
Matthew Showley is supervised by Brian Matter.

Matthew Showley's Contact Information:
(619) 298-3993 x101 matt@myccmi.com

Brian W. Matter, CFP®, CPWA®, CEPA, Principal

Educational Background:
Brian was born in 1979. He attended Brigham Young University and graduated with a Bachelor of Science in Business Management in 2001. Brian also completed theCFP® Certification Professional Education Program from the College for FinancialPlanning in 2009. Brian successfully completed the CERTIFIED FINANCIAL PLANNER™ curriculum and passed the comprehensive examination in March 2010, prior to joining CCMI in June of 2010. Brian received his CFP® designation inSeptember of 2012. Brian successfully completed the Certified Private Wealth Advisor® program through the Yale School of Management, passed the comprehensive examination, and received the CPWA® designation in June 2020. Brian completed the Certified Exit Planning Advisor program through the Exit Planning Institute and passed the comprehensive examination to receive the CEPA designation in January 2021.

Business Experience:
Prior to joining CCMI LLC's predecessor (CCMI), Brian spent eight years at a "Big Four" public accounting firm, Ernst & Young. Brian achieved the rank of Senior Manager in the Advisory Services group and helped to manage a team in the SanDiego office which served clients ranging from small start-ups to Fortune 500 corporations in a variety of industries.

He is a member of the national and local chapters of the Financial Planning Association and a member of National Association of Personal Financial Advisors. Brian actively works with clients in both the financial planning and investment management services.

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

Disciplinary Information:
None

Other Professional Activities:
Financial Planning Association National and San Diego Chapters (Member), BYU Management Society San Diego Chapter (Board member*);* San Diego Downtown Breakfast Rotary Club; San Diego Downtown Breakfast Rotary Foundation (Board Member); National Association of Personal Financial Advisors (Member); LEAD San Diego Graduate (2014); Entrepreneur's Organization (Member); Investments and Wealth Institute (Member); Exit Planning Institute (Member)

Additional Compensation:
Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI LLC, its principals, and employees.

Supervision:
Brian Matter is supervised by Matthew Showley.

Brian Matter's Contact Information:
(619) 298-3993 x102 brian@myccmi.com

Kimberly M. Benson "Kim", CFP®, CPA, CeFT®, Principal

Educational Background:
Kim was born in 1978. She attended Bryant University and graduated with a Bachelor of Science in Business Administration in Accounting with a minor in Legal Studies in 2001. She later obtained a Certificate in Financial Planning in 2017 through Bryant University's online program. Kim successfully completed the CERTIFIED FINANCIAL PLANNER™ curriculum and passed the comprehensive examination in March 2017, after joining CCMI in November of 2015. Kim received her CFP® designation in October of 2017. Kim completed the Certified Financial Transitionist (CeFT®) program and passed the test to become a CeFT® in 2022.

Business Experience:
Prior to joining CCMI LLC's predecessor (CCMI), Kim spent 12 years of her career at United Technologies where she held roles of increasing responsibility within

corporate finance, including a 2-year international assignment near Paris, France. Prior to this, Kim began her career at a "Big Four" public accounting firm, PricewaterhouseCoopers and served clients in the Commercial and Industrial Products and Services practice in the Boston, MA and Charlotte, NC areas. Kim is also a Certified Public Accountant (CPA).

Kim joined CCMI, the predecessor firm to CCMI LLC in 2015 as a Financial Planning Associate. Kim actively works with clients in both financial planning and investment management services. Kim became a Principal at CCMI in 2022. She is a member of the national and local chapters of the Financial Planning Association (FPA) and a member of the American Institute of Certified Public Accountants (AICPA).

Kim grew up in Maine and in her spare time she enjoys outdoor activities including biking, hiking and skiing. Kim enjoys spending time with her husband Tyler and together they like to cook, travel, visit with family and friends, enjoy the outdoors and relax at home with their dog.

Disciplinary Information:
None

Other Professional Activities:
Financial Planning Association National and San Diego Chapters (Member), Bryant University Alumni Association (Member*);* National Association of Personal Financial Advisors (Member); San Diego Rotary Club 33, Women in Business San Diego Chapter (Past-President and Membership Co-Chair 2021-2022), American Institute of Certified Public Accountants (Member), LEAD Impact San Diego Graduate (2019), Financial Transitionist Institute (Member), Estate Planning Council of SanDiego (Member).

Additional Compensation:
Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI LLC, its principals, and employees.

Supervision:
Kim Benson is supervised by Brian Matter.

Kim Benson's Contact Information:
(619) 298-3993 x103 kim@myccmi.com

Tina M. Vieregg, CFP®, BFA™

Educational Background:
Tina was born in 1969. She attended Kent State University and graduated with a Bachelor of Arts in Business Administration with a concentration in Finance in 1991. She later obtained a graduate certificate in Financial and Tax Planning from San Diego State University in 2019 and a Master of Science in Business Administration (MSBA) with a concentration in Financial and Tax Planning from San Diego State University in 2022. Tina earned her CERTIFIED FINANCIAL PLANNER™ designation in March 2019 and her Behavior Financial Advisor (BFA™) designation in March 2020.

Business Experience:

Prior to joining CCMI, LLC, Tina spent three years as a Financial Advisor with Seaside Wealth Management in San Diego where she created and presented personalized financial plans and managed the investment portfolios for her clients. Before passing her CFP®, Tina worked at eMoney Advisor, a leading financial technology company where she assisted other Financial Advisors in preparing complex financial plans using the firm's software.

Tina began her career as a registered representative with Morgan Stanley. Later, she joined an Independent RIA where she was a member of the Investment Committee. Tina was instrumental in administering the due diligence efforts for the investment products that were used in client portfolios and assisted in setting investment policy for client accounts.

Tina grew up in Ohio and moved to San Diego in 2007. Tina and her husband Dave have two daughters and they enjoy spending time together as a family. They are members of San Diego Yacht Club where they spend as much time on the water as possible and are involved in sailboat racing.

Disciplinary Information:
None

Other Professional Activities:
Financial Planning Association National and San Diego Chapters (Member), National Association of Personal Financial Advisors (Member) and is a past volunteer for Junior Achievement of San Diego.

Additional Compensation:
Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI LLC, its principals, and employees.

Supervision:
Tina Vieregg is supervised by Matt Showley and Brian Matter

Tina Vieregg's Contact Information:
(619) 298-3993 x112 tina@myccmi.com