

FORM CRS

Item 1. Introduction. AMMON GRESHAM DUNTON, JR. (the Advisor" or "I") is a Registered Investment Advisor, registered with the Securities and Exchange Commission under the 1940 Investment Advisors Act. He is a partner in DUNTON, SIMMONS & DUNTON, LLP, with offices in White Stone, Virginia. Free and simple tools are available to research Registered Investment Advisors at <https://www.Investor.gov/CRS>

Item 2. Relationships and Services. WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

I provide investment management services to trusts of which I am a trustee, investment advice to 401K programs and advice to non-professional trustees, assisting them in the investment of trust assets. I also provide beneficiaries of trusts with independent analysis of their trustee's work in managing investments held in their trusts. As a part of my standard services I provide monitoring reports to retail investors after each calendar quarter unless the client prefers semi-annual or annual reports. Where I have discretionary authority, as when acting as a trustee, I make decisions to buy or sell securities. More detailed information is available in a disclosure brochure available upon request.

Ask your financial professional:

Given my financial situation, should I choose an investment advisory service? Why or why not?

An investment advisor can tailor your portfolio to your risk tolerance and can advise on asset allocations. In addition, continuous monitoring of your holdings may provide additional safety.

How will you choose investments to recommend to me?

My investment method is discussed in the Disclosure Brochure, available upon request.

What is your relative experience, including your licenses, education and other qualifications? What do these qualifications mean?

Degrees from Yale University and University of Virginia Law School, and 45 years of investment experience. Registered Investment Advisor, registered with the Securities and Exchange Commission under the 1940 Investment Advisors Act.

Item 3. Fees, Costs, Conflicts, and Standards of Conduct. WHAT FEES WILL I PAY?

In general, the following fee schedule is applied to all trusts and accounts accepted by the Adviser:

First Million of Assets:	
Debt investments	.667 of 1% of principal
Equity investments	1% of principal
Second Million of Assets:	
Debt investments	.333 of 1% of principal
Equity investments	.5 of 1% of principal
Over \$2,000,000:	
Debt investments	.167 of 1% of principal
Equity investments	.25 of 1% of principal

The value of assets is determined at the end of each calendar quarter and one quarter of the annual fees will be calculated using end of quarter values and will be billed in arrears at that time. The above fees include trustee's legal responsibilities as well as investment services for both revocable and irrevocable trusts. Any out-of-pocket expenses required in trust administration will be billed to the trust. If unusual functions are involved (for example, care of incompetents, managing a business, or sale of difficult to sell

assets), fees may be larger than specified in the schedule. In very unusual cases, time may be charged in lieu of the above schedule.

All assets must be held by an independent custodian that will charge its fees directly to the client's account. Reports are rendered by the custodian directly to the client on a quarterly basis unless other reporting times are requested by the client. Trust tax returns are prepared by a tax attorney in the firm of Dunton, Simmons & Dunton, LLP and fees for the tax service are billed separately at the time that the returns are prepared and forwarded to the client. No commissions or markups are charged to clients by the Adviser. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

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

Costs depend upon the amount of assets being managed and the mix of those assets. If equities are 60% and fixed-income and cash are 40% annual investment costs vary from \$86.60 to \$21.66 for a \$10,000 investment plus custodial fees paid to an independent custodian, usually less than one third of the above fees.

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISOR? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

When we act as your investment Advisor we have to act in your best interest and not put our interests ahead of yours. At the same time the way we make money may create a conflict with your interests. Here is an example of such a conflict:

A trust must file its own income tax returns. As a service Dunton, Simmons & Dunton, LLC prepares such returns and charges a fee for preparing those tax returns. Such fee is payable from your trust.

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

We advise you of the fees, which will reduce your account when paid.

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

We charge standardized fees based on the size of the account as noted above. We ordinarily do not accept accounts of less than one million dollars. In unusual situations where assets of the trust or responsibilities of the trust require more than normal amounts of time (such as sale of a business, care of an incompetent) additional fees may be incurred.

Item 4. Disciplinary History. DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

Ask your financial professional: As a financial professional do you have and disciplinary history?

I have no legal or disciplinary history and no history of complaints. You may consult <https://www.investor.gov/crs> for a free and simple search tool to research financial professionals

Item 5. Additional Information. If you wish additional information you may contact the Advisor by telephone at 804-435-4000 or by email at dunton@dSDLaw.com or by regular mail at P.O. Box 5, White Stone, Virginia 22578