

**Part 2A of Form ADV: Firm Brochure**

Form ADV, Part 2A, Item 1

**Cover Page**



7000 Central Parkway, Suite 1770  
Atlanta, GA 30328

Tel: (678) 690-8800  
Fax: (678) 690-8900  
Website: [www.cmcfg.com](http://www.cmcfg.com)

March 30, 2020

**FORM ADV PART 2  
FIRM BROCHURE**

This brochure provides information about the qualifications and business practices of CMC Financial Group, LLC. If you have any questions about the contents of this brochure, please contact us at (678) 690-8800. 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 CMC Financial Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for CMC Financial Group, LLC is 292413.

CMC Financial Group, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## ***Material Changes***

### Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30th. We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (678) 690-8800 or [mark@cmcfg.com](mailto:mark@cmcfg.com).

### Material Changes since the Last Update

Since the last Annual Update filed on March 27, 2019, CMC Financial Group, LLC has had the following material changes:

- None

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## ***Advisory Business***

### **A. Description of the Advisory Firm**

CMC Financial Group, LLC (hereinafter “CMCFG”) is a Registered Investment Adviser based in Atlanta, Georgia, and incorporated under the laws of the State of Georgia. CMCFG is owned by Mark Barry McCarthy and Philip Oraien Catledge. CMCFG is registered with the Securities and Exchange Commission and is subject to its rules and regulations. Incorporated in December 2008, CMCFG previously provided investment advisory and brokerage services as a DBA through another firm, however in March 2018 CMCFG became an independently registered investment adviser with the Securities and Exchange Commission.

### **B. Types of Advisory Services**

#### ***Portfolio Management Services***

CMCFG offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Each client completes a form which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

CMCFG evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. CMCFG will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in a software generated risk assessment, which is provided to each client.

CMCFG seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of CMCFG’s economic, investment or other financial interests. To meet its fiduciary obligations, CMCFG attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, CMCFG’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is CMCFG’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

CMCFG may recommend clients to third-party investment advisers to manage all or a portion of the client's assets. Before recommending other advisers to clients, CMCFG will ensure those other advisers are properly licensed or registered as an investment adviser. CMCFG conducts due diligence on any third-party investment adviser, which

may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. CMCFG will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

### ***Financial Planning***

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

### ***Retirement Plan Services***

CMCFG provides retirement plan consulting services to employer sponsored retirement plans. The services may include general advising to the Investment Manager / Sponsor of the Plan on investment options, as well as participant education.

### ***Services Limited to Specific Types of Investments***

CMCFG generally does not limit its investment advice, but most often provides investment advice related to mutual funds, fixed income securities, insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, non-U.S. securities, although CMCFG primarily recommends ETFs. CMCFG may use other securities as well to help diversify a portfolio when applicable.

## **C. Client Tailored Services and Client Imposed Restrictions**

CMCFG offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CMCFG from properly servicing the client account, or if the restrictions would require CMCFG to deviate from its standard suite of services, CMCFG reserves the right to end the relationship.

## **D. Wrap Fee Program**

CMCFG may recommend a Wrap Fee Program for the client's account(s). A "Wrap Fee Program" for purposes of the SEC is a program under which investment advisory and brokerage execution services are provided for a single "wrapped" fee that is not based on the transactions in a client account. CMCFG provides discretionary and non-discretionary investment advisory services to its clients through a Wrap Fee Program. Wrap Fee Program accounts recommended by CMCFG are not managed differently from non-Wrap Fee Program accounts. Because brokerage execution costs are included in the client's overall advisory fee, the client's fee may be greater than those that have accounts in non-Wrap Fee Program accounts, however fees will not exceed

the fee schedule stated in CMCFG's Wrap Fee Brochure. All clients with Wrap Fee Program accounts will be provided with CMCFG's Wrap Fee Brochure. This Brochure is focused on non-Wrap Fee Program accounts.

#### E. Assets Under Management

CMCFG has the following assets under management, calculated on March 19, 2020:

Discretionary: \$146,362,317

Non-discretionary: \$13,689,767

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### ***Fees and Compensation***

#### A. Fee Schedule

##### ***Portfolio Management Fees***

Total Account Value	Maximum Annual Advisory Fee
All Assets	2.00%

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of CMCFG's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 7 days' written notice.

##### ***Selection of Other Advisers Fees***

CMCFG may recommend clients to third-party investment advisers. The fees are generally negotiable and will be stated in each Agreement signed by the Client. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

##### ***Financial Planning Fees***

###### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$250 and \$10,000, depending on the scope and complexity of the requested services.

Clients may terminate the agreement without penalty for a full refund of CMCFG's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 7 days' written notice.

#### ***Retirement Plan Consulting Fees***

CMCFG charges a maximum of 0.60% annually based on the amount of assets in the Plan.

### **B. Payment of Fees**

#### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in advance.

#### ***Payment of Selection of Other Advisers Fees***

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor.

#### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check.

Fixed financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan and/or completion of the project.

#### ***Payment of Retirement Plan Consulting Fees***

The Plan sponsor compensates CMCFG directly on a quarterly basis.

### **C. Client Responsibility for Third Party Fees**

In addition to advisory fees paid to CMCFG as explained above, clients may pay custodial service, account maintenance, transaction, and other fees associated with maintaining the account. Some of these fees may be included in Wrap Fee Program accounts as described above in Item 4 – Advisory Services. These fees vary by broker and/or custodian. Clients should ask CMCFG for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the annual advisory fee. CMCFG does not share any portion of such fees. Additionally, for any mutual funds purchased, the client may pay their proportionate share of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with CMCFG and are compensation to the fund manager. Clients are urged to read the mutual fund prospectus prior to investing.

Mutual fund companies impose internal fees and expenses on clients. These fees are in addition to the costs associated with the investment advisory services as described above. Complete details of such internal expenses are specified and disclosed in each mutual fund company's prospectus. Clients are strongly advised to review the prospectus(es) prior to investing in such securities.

Mutual funds purchased or sold in broker-dealer accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Mutual funds held in broker-dealer accounts also charge management fees. These mutual fund management fees may be more or less than the mutual fund management fees charged if the client held the mutual fund directly with the mutual fund company.

#### D. Prepayment of Fees

CMCFG collects fees quarterly in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

#### E. Outside Compensation for the Sale of Securities to Clients

Neither CMCFG nor its supervised persons accept any compensation for the sale of securities, including asset-based sales charges or service fees from the sale of mutual funds.

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### ***Performance-Based Fees and Side-By-Side Management***

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

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### ***Types of Clients***

CMCFG generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Corporations or Business Entities

There is no account minimum for any of CMCFG's services.

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### ***Methods of Analysis, Investment Strategies, and Risk of Loss***

#### **A. Methods of Analysis and Investment Strategies**

##### ***Methods of Analysis***

CMCFG's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Quantitative analysis and Technical analysis.

**Charting analysis** involves the use of patterns in performance charts. CMCFG uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

##### ***Investment Strategies***

CMCFG uses long term trading and short term trading strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

#### **B. Material Risks Involved**

##### ***Methods of Analysis***

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Quantitative analysis** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

### ***Investment Strategies***

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Selection of Other Advisers:** Although CMCFG will seek to select only money managers who will invest clients' assets with the highest level of integrity, CMCFG's selection process cannot ensure that money managers will perform as desired and CMCFG will have no control over the day-to-day operations of any of its selected money managers. CMCFG would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks or investment "style drift".

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment

performance, particularly through increased brokerage and other transaction costs and taxes.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

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### ***Disciplinary Information***

#### A. Criminal or Civil Actions

There are no criminal or civil actions to report.

#### B. Administrative Proceedings

There are no administrative proceedings to report.

#### C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

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### ***Other Financial Industry Activities and Affiliations***

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

Neither CMCFG nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

#### B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither CMCFG nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

Mark Barry McCarthy and Philip Oraien Catledge are independent licensed insurance agents, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CMCFG always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of CMCFG in connection with such individual's activities outside of CMCFG.

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

CMCFG may recommend clients to third-party investment advisers to manage all or a portion of the client's assets. Clients will pay CMCFG its standard fee, in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between CMCFG and each third-party advisor. CMCFG will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. CMCFG will ensure that all recommended advisers are licensed, or notice filed in the states in which CMCFG is recommending them to clients.

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## ***Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***

### A. Code of Ethics

CMCFG has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. CMCFG's Code of Ethics is available free upon request to any client or prospective client.

### B. Recommendations Involving Material Financial Interests

CMCFG does not recommend that clients buy or sell any security in which a related person to CMCFG or CMCFG has a material financial interest.

### C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of CMCFG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of CMCFG to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. CMCFG will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

#### D. Trading Securities at/Around the Same Time as Clients' Securities

From time to time, representatives of CMCFG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of CMCFG to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, CMCFG will never engage in trading that operates to the client's disadvantage if representatives of CMCFG buy or sell securities at or around the same time as clients.

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### ***Brokerage Practices***

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

Custodians/broker-dealers will be recommended based on CMCFG's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and CMCFG may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in CMCFG's research efforts.

CMCFG recommends Trade-PMR Inc., Member FINRA SIPC.

##### 1. Research and Other Soft-Dollar Benefits

CMCFG has no formal soft dollars program in which soft dollars are used to pay for third party services. Additionally, CMCFG does not receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits").

##### 2. Brokerage for Client Referrals

CMCFG receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### 3. Clients Directing Which Broker/Dealer/Custodian to Use

CMCFG does not permit clients to direct it to execute transactions through a specified broker-dealer.

## B. Aggregating (Block) Trading for Multiple Client Accounts

If CMCFG buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, CMCFG would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. CMCFG would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

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## ***Review of Accounts***

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

All client accounts for CMCFG's advisory services provided on an ongoing basis are reviewed at least monthly by Mark B McCarthy or Philip O. Catledge with regard to clients' respective investment policies and risk tolerance levels. All accounts at CMCFG are assigned to these reviewers.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Mark B McCarthy or Philip O. Catledge. Financial planning clients may be provided a one-time financial plan concerning their financial situation. After the completion of the project, there are no further reports. Clients may request additional plans or reports for a fee.

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

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, CMCFG's services will generally conclude upon delivery of the financial plan and/or conclusion of the project.

### C. Content and Frequency of Regular Reports Provided to Clients

Each client of CMCFG's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. CMCFG will also provide at least quarterly a separate written statement to the client.

Each financial planning client may receive the financial plan upon completion, or other project-related documents.

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### ***Client Referrals and Other Compensation***

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

CMCFG does not receive any economic benefit, directly or indirectly from any third party for advice rendered to CMCFG clients.

#### B. Compensation to Non – Advisory Personnel for Client Referrals

CMCFG does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

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### ***Custody***

CMCFG does not have physical custody of any client funds and/or securities, and does not take custody of client accounts at any time. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian. However, by granting CMCFG written authorization to automatically deduct fees from client accounts, CMCFG is deemed to have limited custody. You will receive account statements from the independent, qualified custodian holding your funds at least quarterly. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Clients should carefully review statements received from the custodian.

Some clients may execute limited powers of attorney or other standing letters of authorization that permit the firm to transfer money from their account with the client's independent qualified Custodian to third-parties. This authorization to direct the Custodian may be deemed to cause our firm to exercise limited custody over your funds or securities and for regulatory reporting purposes, and we are required to keep track of the number of clients and accounts for which we may have this ability. CMCFG does not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified

custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate any transfers that may have taken place within your account(s) each billing period. You should carefully review account statements for accuracy.

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### ***Investment Discretion***

Before CMCFG can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, you may grant the firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary authority for investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to the IAR in writing. Please refer to the “Advisory Business” section of this Brochure for more information on our discretionary management services.

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### ***Voting Client Securities***

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

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### ***Financial Information***

#### **A. Balance Sheet**

CMCFG neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

Neither CMCFG nor its management has any financial condition that is likely to reasonably impair CMCFG’s ability to meet contractual commitments to clients.

#### **C. Bankruptcy Petitions in Previous Ten Years**

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