

Item 1 – Cover Page

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This brochure provides information about the qualifications and business practices of Capital Consulting & Asset Management. If you have any questions about the contents of this Brochure, please contact us at (402) 477-2500 or toll free at 888-818-2226 and/or CSM@ccam.net. 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 Capital Consulting & Asset Management also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Capital Consulting & Asset Management is 41438.

Any references to Capital Consulting & Asset Management as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.

Item 2 - MATERIAL CHANGES

Since our last annual update of this disclosure brochure, we have made the following updates to this disclosure brochure.

First Update 03/31/2012: Updated Assets Under Management to \$104 million (Item 4, Section E, Page 4).

Updated 4/4/2012: Revised description of Qualified Plan Consulting Services in Items 4 and 5 to provide a more detailed description of the services provided and the fees charged for such service (pages 4 and 6). Revised the description of Item 10 to disclose our additional business activity as an insurance agency (page 18).

Updated 06/15/2012: Added new investment styles (Item 4, Page 5).

Updated 02/01/2013: Updated Assets Under Management to \$127 million (Item 4, Sect E, Page 4).

Updated 10/01/2013: Updated items under Privately Managed Portfolio Program (Item 5, page 13) and Qualified Plan Consulting & Fiduciary Services (Item 5, page 15).

Updated 01/01/2014: Updated Assets Under Management to \$152 million (Item 4, Section E, Page 4).

Updated 04/30/2014: Updated our description of Fiduciary Management Services (Item 4, Pages 6-7).

Updated 05/15/2014: Description of Brokerage Practices (Item 12, page 22).

Updated 01/30/2015: Updated Assets Under Management to \$170 million (Item 4, Sect E, Page 4) and updated description under Brokerage Practices (Section 12, Page 22).

Updated 01/30/2016: Updated Assets Under Management to \$164 million (Item 4, Sect E, Page 4).

Updated 03/01/2017: Updated Assets Under Management to \$162 million (Item 4, Sect E, Page 4) and Updated ownership information (Item 4, Sect 4, Page 4).

Updated 03/01/2018: Updated Assets Under Management to \$186 million (Item 4, Sect E, Page 4).

Updated 03/01/2019: Updated Assets Under Management to \$172 million (Item 4, Sect E, Page 4).

Updated 12/01/2019: Added a new service, "Invest RX (Item 4; page 10; Item 5; page 16, Item 12; page 25; Item 13; page 25; Item 16; page 27, Item 17; page 27).

Updated 03/01/2020: Updated Assets Under Management to \$197 million (Item 4, Sect E, Page 4).

TABLE OF CONTENTS

Item 2 - MATERIAL CHANGES	2
Item 4 - ADVISORY BUSINESS	4
Privately Managed Portfolio Program (“PMP”).....	5
Qualified Plan Consulting, Fiduciary Services & Fiduciary Management Services	6
Financial Planning and Consulting Services.....	9
Invest RX - A Robo Advisor Program	10
General Information.....	10
Item 5 - FEES AND COMPENSATION	11
Privately Managed Portfolio Program (“PMP”).....	12
All Inclusive Fee for Mutual Fund Portfolios Managed by CCAM	14
Qualified Plan Consulting Services	15
Financial Planning and Consulting Services.....	16
Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT.....	16
Item 7 - TYPES OF CLIENTS	17
Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS	17
Selection of Investment Managers Participating in PMP	17
Item 9 - DISCIPLINARY INFORMATION	19
Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS	19
Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING.....	20
Item 12 - BROKERAGE PRACTICES.....	22
Item 13 - REVIEW OF ACCOUNTS.....	25
Privately Managed Portfolio Program	25
Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION.....	25
Item 15 - CUSTODY	26
Item 16 - INVESTMENT DISCRETION.....	26
Item 17 - VOTING CLIENT SECURITIES.....	27
Item 18 - FINANCIAL INFORMATION	27
Item 19 - REQUIREMENTS FOR STATE REGISTERED ADVISERS	28
Brochure Supplements	

Item 4 - ADVISORY BUSINESS

Capital Consulting & Asset Management (hereinafter referred to as “CCAM”) is an investment advisor firm registered with the Securities and Exchange Commission (“SEC”) offering a variety of advisory services customized to your individual needs.

- A. CCAM was established in May of 1996. CCAM is wholly owned by Robert E. Nixon and Amber Roemer.
- B. CCAM offers the following advisory services. Each of the services is more fully described below.
 - Financial Planning and Consulting
 - Portfolio Manager Evaluation, Selection, Due Diligence and Monitoring
 - Privately Managed Portfolio Program
 - Qualified Plan Consulting Services & Fiduciary Services
- C. CCAM tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities.

CCAM will ask you to complete a client profile form to assist CCAM with obtaining information about your financial situation and history. Additionally, CCAM will meet with you and conduct an interview and data gathering session to continue the due diligence process. You should expect one to three meetings before implementation of recommendations begins (both in person and via phone conference). The information gathered by CCAM will assist CCAM to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, CCAM will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
 - Attitudes toward risk
 - Investment objectives
 - Investment horizon
 - Financial needs
 - Cash flow analysis
 - Cost of living needs
 - Education needs
 - Savings tendencies
 - Other applicable financial information required by CCAM in order to provide the investment advisory services requested
- D. CCAM does not participate in a wrap fee program in which CCAM provides portfolio management services.
 - E. As of December 31, 2019 we have \$197 million of client assets under our discretionary management. We provide consulting on approximately \$100 million non-discretionary client assets.

Privately Managed Portfolio Program (“PMP”)

The PMP Program provides individual portfolio management for an all-inclusive fee.

The Privately Managed Portfolio Program (“PMP”) offers individually managed investment accounts to clients, for clients with more than \$500,000 of assets under management, providing access to the investment advisory services of a select, prescreened group of investment advisers (investment managers).

CCAM, through the PMP Program, helps investors select appropriate advisor/money managers to manage their portfolio, pays the manager's investment advisory fee on behalf of the investor, monitors and evaluates the manager's performance, executes the investor's portfolio transactions without commission charge, and provides custodial services for the investor's assets, or provides any combination of these or other services, all for a single fee all-inclusive fee paid by the investor to CCAM. The program also provides for on-going consulting services, account monitoring and performance reporting.

Portfolio composition will be determined based on each client's needs and portfolio restrictions, if any, the client's financial goals, age and risk tolerances. CCAM has created various model portfolios: The portion of the portfolio under direct management by CCAM will be managed based on one of CCAM's model portfolios. Your managed account may be similarly managed and contain similar holdings as compared to other clients' managed accounts. Should CCAM make a change to its model portfolios, the change will be implemented across all clients' accounts participating in the model portfolio regardless of taxable gains or losses.

Typically when a client has under \$500,000 of assets under management, CCAM will itself manage the client's portfolio. In this instance, CCAM will design and continuously manage a portfolio consisting entirely of mutual funds (primarily, though not necessarily exclusively, of no-load mutual funds) with the goal of meeting each client's individual needs.

The PMP program offers advice regarding equity securities, warrants, corporate debt, commercial paper, bank certificates of deposit, municipal securities, investment company securities, U.S. government securities, options and futures contracts and partnerships, including real estate, equipment leasing and mortgage leasing. Some strategies, such as with option contracts, involve more risk and are only appropriate for certain investors.

In selecting independent money managers, CCAM will use an asset allocation strategy, recommending one or more managers in the following investment styles:

- | | |
|---|--|
| 1. Large Cap Growth | 2. Large Cap Value |
| 3. Mid Cap Growth | 4. Mid Cap Value |
| 5. Small Cap Growth | 6. Small Cap Value |
| 7. Natural Resources/Hard Assets | 8. Small/Mid Technology Growth |
| 9. International Growth | 10. International Value |
| 11. International Emerging Markets | 12. Taxable Fixed Income |
| 13. Tax Exempt Fixed Income | 14. Fixed Income: Insurance Company GIC/SPDA |
| 15. Fixed Income: High Yield Bonds | 16. Fixed Income: Real Estate: REITs |
| 17. Fixed Income: Convertible Bonds Securities) | 18. Fixed Income: TIPS (Treasury Inflation Protected |
| 19. Fixed Income Adjustable Rate Governments | |

CCAM will assist the client in determining which portion of his or her assets should be allocated among these investment styles and will recommend appropriate managers within each style.

Selection of Money Manager for Clients

Based on CCAM's understanding of the client's investment needs and objectives, CCAM will recommend one or more investment managers from those participating in the program whose investment philosophy and objectives CCAM believes are most compatible with the client's investment philosophy and objectives.

Both CCAM and client-chosen investment managers have discretionary authority.

Clients are advised that an investment manager's past performance is not a guarantee of future results. Certain market and economic risks exist that may adversely affect a manager's performance which could result in capital losses in that client's account. The selection of risk parameters and comparative indices by CCAM with which to compare a client's account performance are for informational purposes only. No guarantee is expressed or implied that the client's account performance will compare favorably to such parameters or indices.

CCAM will continuously monitor the investments made for each client account being managed by one or more money managers. During this part of the process CCAM monitors the managers and investments selected by the client. In situations where CCAM believes that a recommended money manager is not meeting the client's goals, CCAM may recommend the use of another money manager. Additionally, CCAM will recommend a replacement of a manager if CCAM believes the manager is not adhering to stated management style or objectives, has a material change in the professional staff, unexplained poor performance, or inconsistencies among accounts managed by the same manager.

You are advised transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

Qualified Plan Consulting, Fiduciary Services & Fiduciary Management Services

CCAM provides qualified plan committees with the following Fiduciary Retirement Plan Consulting Services:

- **Investment Policy Statement.** CCAM will help the retirement plan client develop an investment policy statement. The investment policy statement establishes the investment policies and objectives for the Plan. The retirement plan client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the investment policy statement.
- **Investment Selection Services.** CCAM will provide the retirement plan client with recommendations of investment options consistent with ERISA section 404(c).
- **Due Diligence Review.** Upon request, CCAM will provide retirement plan client with periodic due diligence reviews of the Plan, the Plan's fees and expenses, and the Plan's portfolio managers.
- **Investment Monitoring.** Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund

management and conformation to the guidelines set forth in the investment policy statement and make recommendations to maintain or remove and replace investment options.

- **Qualified Plan Development.** If needed, CCAM will assist a retirement plan client with the establishment of a qualified plan by working with the retirement plan and a selected Third Party Administrator. If the retirement plan client has not already selected a Third Party Administrator, CCAM will assist the retirement plan client with the review and selection of a Third Party Administrator for the retirement plan.
- **Participant Educational Presentations.** CCAM will provide educational presentations for Plan participants. Presentations to the retirement plan participants are informational in nature and intended to provide an overview of the retirement plan and the plan's investment options. Educational presentations will not take into account the individual circumstances of each participant and individual recommendations will not be provided unless otherwise agreed upon.
- **Participant Enrollment.** CCAM will assist in the group enrollment meetings designed to increase retirement plan participation among employees and investment and financial understanding by the employees.

During the course of the annual service cycle, it is understood that CCAM may not in any given year perform each of the above services, as some services are offered on an as-needed basis. It is understood that CCAM will be entitled to the full annual service fee regardless of whether all Plan consulting services are needed on an annual basis.

CCAM also offers retirement plans with Fiduciary Management Services. If a retirement plan engages CCAM for Fiduciary Management Services, the retirement plan client will appoint CCAM as its investment adviser of record of the retirement plan. The retirement plan's Account will consist only of separate account(s) held by qualified custodian(s) under the name of the retirement plan client. The qualified custodian(s) will maintain physical custody of all funds and securities of the retirement plan client, and the retirement plan client will retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the retirement plan. The retirement plan client's beneficial interest in a security does not represent an undivided interest in all the securities held by the qualified custodian(s), but rather represents a direct and beneficial interest in the securities which comprise the Account. At least quarterly, the retirement plan or retirement plan participants will receive an account statement from the qualified custodian or the Third-Party Administrator to the retirement plan detailing transactions in the Account.

Upon appointment as an investment adviser of the Account, CCAM will obtain from the retirement plan client information to determine the retirement plan's financial situation, investment objectives and risk tolerance. If an investment policy statement does not exist, a specific investment strategy and investment policy will be crafted for the retirement plan client that focuses on the retirement plan's specific goals and objectives. As described below, the retirement plan may impose reasonable restrictions upon CCAM's management of the Account's securities, including the ability to instruct CCAM not to purchase certain securities on behalf of the Account. The Account will be managed by CCAM, in accordance with the instructions listed below, on the basis of the retirement plan's investment policy statement.

The retirement plan will timely notify CCAM of any changes to the retirement plan's financial situation or investment objectives or if the retirement plan wants to impose and/or modify any

reasonable restrictions on the management of the Account. At least annually, CCAM will contact the retirement plan to determine whether the plan's financial situation, investment objectives or risk tolerance have changed, or if the plan wants to impose and/or modify any reasonable restrictions on the management of the Account. CCAM will be reasonably available to consult with retirement plan relative to the status of the Account.

Under the Fiduciary Management Services, CCAM will provide a retirement plan client with continuous and ongoing supervision over the designated retirement plan assets. CCAM will actively monitor the designated retirement plan assets and provide advice to retirement plan client regarding buying, selling, reinvesting or holding securities, cash or other investments of the retirement plan. In order for CCAM to provide Fiduciary Management Services, the retirement plan client grants CCAM discretionary authority to make all decisions to buy, sell or hold securities, cash or other investments for the designated retirement plan assets in the sole discretion of CCAM without first consulting with the retirement plan or its participants. The retirement plan client also grants CCAM the power and authority to carry out these decisions by giving instructions, on behalf of retirement plan, to brokers and dealers and the qualified custodian(s) of the retirement plan for CCAM's management of the designated retirement plan assets.

If a retirement plan client has elected to utilize CCAM's Fiduciary Management Services, then CCAM will be acting as an Investment Manager to the Plan, as defined by ERISA section 3(38), with respect to the management of the retirement plan's assets subject to investment discretion, and CCAM acknowledges that it is a fiduciary with respect to its exercise of discretion.

CCAM acknowledges that Fiduciary Management and Fiduciary Consulting services constitute investment advice to a retirement plan for compensation and, as a consequence, CCAM is deemed a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of Employee Retirement Income Security Act of 1974 ("ERISA") when providing such services. CCAM will act in a manner consistent with the requirements of a fiduciary under ERISA for all services for which CCAM is considered a fiduciary under ERISA. If the retirement plan has elected to receive only Fiduciary Consulting Services and no Fiduciary Management Services, then the parties acknowledge and agree that CCAM (a) has no responsibility and will not (i) exercise any discretionary authority or discretionary control respecting management of client's retirement plan, (ii) exercise any authority or control respecting management or disposition of assets of client's retirement plan, or (iii) have any discretionary authority or discretionary responsibility in the administration of client's retirement plan or the interpretation of client's retirement plan documents, (b) is not an "investment manager" as defined in Section 3(38) of ERISA and does not have the power to manage, acquire or dispose of any plan assets, and (c) is not the "Administrator" of client's retirement plan as defined in ERISA. If a retirement plan client has elected to receive any Fiduciary Management Services, then CCAM will be acting as an Investment Manager to the retirement plan as defined by ERISA section 3(38).

CCAM will disclose, to the extent required by ERISA Regulation Section 2550.408b-2(c), to you any change to the information that we are required to disclose under ERISA Regulation Section 2550.408b-2(c)(1)(iv) as soon as practicable, but no later than sixty (60) days from the date on which we are informed of the change (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable).

In accordance with ERISA Regulation Section 2550.408b-2(c)(vi)(A), we will disclose within thirty (30) days following receipt of a written request from the responsible plan fiduciary or Plan Administrator (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable) all information related to the Qualified Retirement Plan Consulting Agreement and any compensation or fees received in connection with the Agreement that is required for the Plan to comply with the reporting and disclosure requirements of Title 1 of ERISA and the regulations, forms and schedules issued thereunder.

If we make an unintentional error or omission in disclosing the information required under ERISA Regulation Section 2550.408b-2(c)(1)(iv) or (vi), we will disclose to you the correct information as soon as practicable, but no later than thirty (30) days from the date on which we learn of such error or omission.

The exact suite of services provided to a retirement plan client will be listed and detailed in the Qualified Retirement Plan Consulting Agreement.

In addition to the above Qualified Plan consulting services, CCAM and other vendors will provide qualified plan clients with the following services:

- Custom designed or prototype plan documents available through our strategic alliances
- Find a custodian
- Provide access to a broad selection of quality investment options, including access to over 11,000 mutual funds, ETF's, and separate accounts
- Offer access to all NTF mutual funds without any commissions, front end, or back end fees
- Offer access to all individual securities transactions at institutional discounted rates
- Offer comprehensive recordkeeping and administration with daily or balance forward valuation methods
- Provide Albridge Solutions portfolio management system reports
- Provide consolidated monthly statements detailing all transactions and asset positions
- Provide consolidated yearly statements detailing all transactions and asset positions

Financial Planning and Consulting Services

CCAM provides specific consultation and administrative services regarding investment and financial concerns of the client. Clients can also receive investment advice on specific area(s) of concern such as education planning, estate planning, retirement planning, or any other specific topic.

Additionally, CCAM provides advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, insurance, and/or annuity advice. This may include the recommendation of so called no-load life insurance products to clients for whom these may be appropriate investments. Financial plan recommendations are not limited to any specific product or service offered by a broker dealer or insurance company.

Clients obtaining financial planning services will be provided a written financial plan with recommendations and actions to assist the client to work toward their stated financial goals and

objectives. In general, the financial plan will address one or more of the following areas of concern:

PERSONAL: Family records, budgeting, personal liability, estate information and financial goals.

TAX & CASH FLOW: Income tax and spending analysis and planning for past, current and future years. We will illustrate the impact of various investments on your current income tax and future tax liability.

DEATH & DISABILITY: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.

EDUCATION OF CHILDREN: Evaluation of assets needed to provide post-secondary education.

RETIREMENT: Analysis of current strategies and investment plans to help the client achieve his or her goals.

ESTATE PLANNING: Analysis of current situation and strategies to help the client achieve his or her goals.

INVESTMENTS: Analysis of investment alternatives and their effect on a client's portfolio.

Planning and consulting services are based on your financial situation at the time and are based on financial information disclosed by you to CCAM. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. CCAM cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify CCAM promptly of the changes. You are advised that the advice offered by CCAM may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

You are not obligated to implement advice through CCAM or Advisory Representatives. Should you implement the plan with CCAM's Advisory Representatives, commissions or other compensation may be received in addition to the advisory fee paid to CCAM.

Invest RX – A Digital Advisor

Through the *Invest RX – A Digital Advisor* program, CCAM offers asset management services to individuals through an online digital platform.

When managing assets in this Program, CCAM will utilize discretionary portfolio models created by CCAM. Upon appointment as an investment adviser of the Account and enrollment of Client into the Program, CCAM will use a digital platform with automated questions to obtain from Client information to determine Client's financial situation, investment objectives and risk tolerance. A specific investment strategy and investment policy is crafted for Client and focuses on Client's specific goals and objectives based upon the information disclosed by Client via the digital platform. CCAM will then recommend via the digital platform an appropriate investment and risk profile ("Profile") based upon the information Client has provided during the online enrollment process. CCAM will actively monitor the Account and make decisions regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account.

CCAM's models are generally limited to ETFs, mutual funds, money markets and cash and will not typically involve other securities such as individual stocks or bonds.

In addition to the above-described asset management services, clients will receive access to a digital platform for clients to monitor their performance, automated account rebalancing, certain digital financial planning tools (e.g., e-Money Advisors), and email and phone communications with CCAM. Through the digital platform, Client will timely notify CCAM of any changes to Client's financial situation or investment objectives.

CCAM has appointed certain investment adviser representatives ("IARs") which will be reasonably available to consult (via telephone or online) with Client relative to the status of the Account. Client understands that the asset management services provided under the *Invest RX* program do not include financial planning, consulting or any other similar services, including in-person consulting with an investment advisor representative of CCAM. Client must execute a separate agreement for other services of CCAM.

In this digital offering, clients do not receive annual reviews or quarterly performance statements from CCAM. However, Clients can, for an additional hourly fee, receive in-person financial planning advice and other comprehensive planning services offered to non-automated clients.

General Information

You are advised the investment recommendations and advice offered by CCAM are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform CCAM promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify CCAM of any such changes could result in investment recommendations and advice not meeting your needs.

Item 5 - FEES AND COMPENSATION

This fee is negotiable based upon the total market value of the client and/or Plan assets, the complexity of the Plan, the number of participants, other relationships CCAM has with the client and/or Plan provider or trustees, the level of service to be provided to the client and/or Plan, the geographical location(s) of client and/or the Plan and number of office locations of the Plan sponsor and Plan participants.

CCAM may change the fee schedules upon 30-days prior written notice to you.

Advisory fees will generally be collected directly from your account, provided you have given CCAM written authorization. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, CCAM has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to CCAM, except for ERISA and IRA accounts. Alternatively, for tax purposes, clients may write a check in the amount of the advisory fee, payable to CCAM.

In the event the client's account is opened after the first day of the calendar quarter, the fees for that quarter are prorated to the number of days left in the quarter and are calculated based on CCAM's appraisal of the market value of the portfolio on the effective date of the client's account. Subsequent fees are determined for calendar quarter periods and will be equal to one fourth of the annualized fee. Additional prorated fees are assessed on the value of cash or securities added to an account.

Privately Managed Portfolio Program ("PMP")

Clients may elect an all-inclusive fee option or an unbundled fee option.

In evaluating an all-inclusive fee arrangement, a client should recognize that brokerage commissions for the execution of transactions in the client's account are not negotiated by the independent investment managers. Transactions are effected "net," i.e., without commission charge, although a portion of the all-inclusive fee is generally considered compensation in lieu of commissions. Trades are generally expected to be executed only with Fidelity Brokerage Services, Inc., Charles Schwab & Co, and Pershing, LLC which are all registered broker-dealers, although investment managers may, if appropriate, place trades with other broker-dealers as part of their fiduciary duty of best execution. Under such a circumstance, any transaction costs will be absorbed by CCAM. Accordingly, the client may wish to satisfy himself that Fidelity, Charles Schwab, and Pershing can provide adequate price and execution of most or all transactions. The client should also consider that, depending upon the level of the wrap fee charged by the broker dealer, the amount of portfolio activity in the client's account, the value of custodial and other services which are provided under the arrangement, the client's ability to locate and retain the desired investment managers, the client's ability to obtain reports of the type provided through PMP, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately and if the managers were free to negotiate commissions and seek best price and execution of transactions for the client's account.

In general, a more actively traded account may cost less under an all-inclusive fee arrangement than if the services were unbundled, and an account which is traded infrequently may cost more under an all-inclusive fee arrangement. Some investment managers may not otherwise be available due to minimum account size requirements.

The all-inclusive fee, described for simplicity as an annual percentage of assets under management, is applied to the account asset value on a pro-rated basis and is billed quarterly in advance. CCAM's fee includes compensation for the advisory and consulting services provided by CCAM, custodial and execution services (including brokerage charges on agency trades effected by the investment managers through broker-dealers), and quarterly performance reports and other account-related services provided.

The PMP fee does not include, and the client will be responsible and charged for, interest on debit account balances, underwriting commissions or discounts relating to securities purchased through public offerings from an underwriter or dealer, exchange fees and odd-lot differentials, transfer taxes and other fees required by law, IRA and qualified retirement account fees, postage and handling fees, and other money market account fees unless prohibited by law. PMP fees are calculated as a percentage of the PMP account value. Fees are calculated quarterly based on CCAM's appraisal of the market value of the assets in the client's account as of the last business

day of the preceding quarter. Fees are assessed on all assets under management including securities, cash and money market balances. Margin debit balances do not reduce the value of assets under management.

Additionally, clients may pay their proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with CCAM and are compensation to the fund-manager.

All Inclusive PMP Fees

Table 1: Fees for PMP Equity and Balanced Account

Account Size	Annual Fee	Quarterly Fee
\$100,000 to \$499,999	2.06%	0.5150%
\$500,000 to 999,999	1.65%	0.4125%
Over \$1,000,000	1.50%	0.3750%

Manager's Portion of Advisory Fee: The manager's portion of the advisory fee will range from .20% to 1.0% of assets under management, to be negotiated with each investment manager, and is paid from the total fee that is paid to CCAM for advisory services.

When CCAM utilizes the services of Lockwood, Lockwood will pay the money manager's portion of the advisory fee on behalf of CCAM. The broker-dealer/custodian will retain from the client's custodial account that portion which is generally considered to be payment for its services in lieu of brokerage commissions. In circumstances where a manager places a trade with a broker other than Fidelity, Schwab or Pershing, the commission costs associated with that trade will be absorbed by CCAM.

Unbundled Fees Including Unbundled PMP Fees

Under this fee arrangement, the advisory and monitoring services provided by CCAM are separate and distinct from any brokerage, custodial, or other charges, as well as the fees charged by money managers in the PMP Program. The annual fee charged for portfolio management services will be based on a percentage of assets under management:

Account Size	Annual Fee
Up to \$150,000	1.50%
Next \$150,000 to \$250,000	1.25%
Next \$250,000 to \$500,000	1.15%
Next \$500,000 to \$1,000,000	1.00%
Over \$1,000,000	0.90%

In addition to the advisory fees above, clients will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. Additionally, clients may pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by CCAM and are charged by the product, broker/dealer or account custodian. CCAM does not share in any portion of such fees.

All Inclusive Fee for Mutual Fund Portfolios Managed by CCAM

Under this fee arrangement, the fee charged by CCAM will also include all brokerage, transaction, and custodial fees charged by Fidelity Brokerage Services, Inc., Charles Schwab & Co., and Pershing LLC unaffiliated broker dealers. CCAM can only offer this all inclusive fee to clients who use Fidelity, Charles Schwab, and Pershing as their custodian. The annual fees are based on a percentage of assets under management as follows:

Account Size	Annual Fee
Up to \$150,000	1.50%
Next \$150,000 to \$250,000	1.25%
Next \$250,000 to \$500,000	1.15%
Next \$500,000 to \$1,000,000	1.00%
Over \$1,000,000	0.90%

Clients will be invoiced (as shown on the custodian statement) at the beginning of each calendar quarter based upon the average of the month end values (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance), of the client's account during the previous quarter.

CCAM from time to time may place assets into guaranteed interest contracts or Single Premium Deferred Annuities with major insurance companies. If CCAM received a fee directly from the insurance company the fee will be offset against CCAM's stated fee charged. Upon Request, Advisor will send Client a fee invoice detailing the amount of the fee offset, the payer of the fee and the services rendered for the fee.

Advisor may indirectly receive 12b-1 fees from certain mutual fund companies for mutual fund purchases. Any 12b-1 fees indirectly received by Advisor will be offset against Advisor's stated fee charged. Upon Request, Advisor will send Client a fee invoice detailing the amount of the fee offset, the payer of the 12b-1 fee, and the services rendered for the 12b-1 fee.

Also, in his or her separate capacity as a registered representative of a broker-dealer, a CCAM representative may indirectly receive 12b-1 fees from certain mutual fund companies for mutual fund purchase made by a retirement plan client. Any 12b-1 fees received indirectly by a CCAM representative for mutual fund purchases by a retirement plan client will be forwarded to the retirement plan's third-party administrator for deposit in an ERISA account (also known as a plan expense account) to offset the plan's administrative expenses.

Advisor does not reasonably expect to receive any other compensation, direct or indirect, for its services. If Advisor receives any other compensation for such services, Advisor will offset that compensation against CCAM's stated fee. Upon Request, Advisor will disclose the amount of the compensation, the services rendered for such compensation and the payer of such compensation.

Termination Provisions

You may terminate services obtained from CCAM, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with CCAM. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account

maintenance or custodial fees. Thereafter, you may terminate services upon CCAM's receipt of your written notice to terminate. Should you terminate investment advisory services during a calendar quarter, you will be issued a pro-rated refund of the advisory fee from the date of termination to the end of the calendar quarter.

Qualified Plan Consulting & Fiduciary Management Services

The annual fee for CCAM's Qualified Plan Consulting and Fiduciary Management Services will be charged based upon the amount of Plan Assets:

Plan Assets	Annual Fee
Up to \$150,000	1.50%
Next \$150,000 to \$250,000	1.25%
Next \$250,000 to \$500,000	1.15%
Next \$500,000 to \$1,000,000	1.00%
Over \$1,000,000	0.90%

For retirement plan sponsors fees are billed in advance (at the start of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the previous billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period.

Fee will be directly deducted from clients' accounts provided client provided CCAM with written authorization. We will provide the custodian with a quarterly fee notification.

Services can be terminated by either party by providing written notice to the other and termination is effective 30 days from the date notice is received. During that 30 day period, we will complete any activities that were in progress when notice of termination was received but will not begin any new services without express instruction from the client. If services are terminated within five business days of signing the client agreement, services are terminated without penalty. Any prepaid but unearned fees are promptly refunded to the client at the effective date of termination.

Pension consulting services are not management services, and CCAM does not serve as administrator or trustee of the plan. CCAM does not act as custodian for any client account or have access to client funds or securities (with the exception of, some accounts, having written authorization from the client to deduct our fees). In addition, we do not implement any transactions in a retirement plan or participant's account. For pension consulting services, the retirement plan or the plan participant who elects to implement any recommendations made by us is solely responsible for implementing all transactions.

CCAM from time to time may place assets including ERISA assets into guaranteed interest contracts or Single Premium Deferred Annuities with major insurance companies. If CCAM received a fee directly from the insurance company the fee will be offset against CCAM's stated

fee charged to the plan. Upon Request, Advisor will send Client a fee invoice detailing the amount of the fee offset, the payer of the fee, and the services rendered for the fee.

In his or her separate capacity as a registered representative of a broker-dealer, a CCAM representative may indirectly receive 12b-1 fees from certain mutual fund companies for mutual fund purchases made by a retirement plan client. Any 12b-1 fees received indirectly by a CCAM representative for mutual fund purchases by a retirement plan client will be forwarded to the retirement plan's third-party administrator for deposit in an ERISA account (also known as a plan expense account) to offset the plan's administrative expenses.

Advisor does not reasonably expect to receive any other compensation, direct or indirect, for its services. If Advisor receives any other compensation for such services, Advisor will offset that compensation against CCAM's stated fee. Upon Request, Advisor will disclose the amount of the compensation, the services rendered for such compensation and the payer of such compensation.

Financial Planning and Consulting Services

You are advised that fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Fees for these services will be billed at an hourly rate of \$100.00 to \$200.00 per hour, based on the consultant involved and the nature and complexity of the client's circumstances, and shall be due and payable as they are earned.

In certain circumstances, all fees and account minimums may be negotiable.

Termination Provisions

You may terminate advisory services obtained from CCAM, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with CCAM. Thereafter, you may terminate services upon CCAM's receipt of your written notice to terminate. You will be responsible for any time spent by CCAM.

Invest RX – A Digital Advisor Program

Investment advisory fees for *Invest RX* are charged based on a percentage of assets under management, billed in advance (at the start of the billing period) on a quarterly calendar basis and calculated based on the fair market value of the Account as of the last business day of the previous billing period. Fees for *Invest RX* are not negotiable.

The annual fee for asset management services under *Invest RX* is 0.60% (60 bps). Of this, a portion of the fee is paid to Fidelity for its services in providing the digital platform for the program. Client's attaining an account size of \$500,000 will become eligible for traditional (non-digital) asset management services of CCAM, should Client desire. To receive asset management services of CCAM, Client must enter a new agreement for the traditional (non-digital) asset management services of CCAM.

The investment advisory fees will be deducted from the account and paid directly to CCAM. Client will authorize the qualified custodian(s) of the Account to deduct fees from the Account and pay such fees directly to CCAM. At least quarterly, Client will receive account statements from the qualified custodian(s) of the Account detailing transactions in the Account, including investment advisory fees charged. Client should review the Account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted. Brokerage commissions and/or transaction ticket fees charged by the qualified custodian will be billed directly to Client by Fidelity Brokerage Services, LLC (as of December 2019; these charges do not exist).

Termination

CCAM's services under the *Invest RX* program are continuous until terminated by either party providing written notice of termination to the other party. In the event that there is a remaining balance of any fees paid in advance after the deduction of fees from the final invoice, those remaining proceeds will be refunded to the client by CCAM.

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

This section is not applicable to CCAM since CCAM does not charge performance based fees.

Item 7 - TYPES OF CLIENTS

CCAM's services are geared toward individuals both high net worth (i.e. clients with a net worth of \$1,500,000) and other than high net worth individuals, banking or thrift institutions, pension and profit sharing plans (other than plan participants), charitable organizations, corporations or other businesses and state or municipal government entities.

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

Selection of Investment Managers Participating in PMP

Managers must be duly registered investment advisers and are screened for financial and organizational stability, historical performance, quality of management, research capabilities and other factors. Investment managers participating in the PMP are reviewed at least once a year and are evaluated and categorized according to their investment philosophy and approach, asset allocation, rate of return expectation and risk. Consideration is also given to methodology, standards and CCAM's verification of investment managers' reported historical composite returns.

CCAM may utilize the services of Morningstar, Fidelity Investments, Standard and Poor's, and/or Lockwood Advisors, firms that provide due diligence reviews of investment managers, monitors manager performance, and provide training and other support services. CCAM independently reviews the PMP pool of investment managers on at least an annual basis. The information CCAM obtains regarding investment managers participating in the PMP is believed

to be reliable and accurate, however, CCAM does not guarantee accuracy nor independently verify reported results. CCAM may remove an investment manager from the program if, in the judgment of CCAM, the manager does not execute its functions in a manner consistent with its stated philosophy and approach or if the manager becomes otherwise unsuitable for continued participation. Such unsuitability may be augmented by material events that may impair the manager's ability to perform its functions.

CCAM reviews performance data of all PMP investment managers and of the PMP accounts they manage on a quarterly, semi-annual and annual basis. Composite results reported by the managers are compared with results of a universe of managers with similar investment philosophies, objectives and approach and with standard market statistics. Composite results are also compared with results prepared by Morningstar, Fidelity Investments, Standard and Poor's, and/or Lockwood in order to determine consistency. Results are reviewed for consistency in investment discipline and approach.

CCAM conducts fundamental and technical analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by CCAM will require you to be prepared to bear the risk of loss and fluctuating performance.

CCAM does not represent, warrant or imply that the services or methods of analysis used by CCAM can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by CCAM will provide a better return than other investment strategies.

The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers, and fund straying from its objective. Open ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time CCAM will direct the client to the appropriate Web page to access the prospectus.

ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index. The risks with stocks and bonds are that their prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with bonds are interest rate, inflation and credit risk. Credit risk is the risk that the bond issuer will be unable to make its payments on time or at all, effectively default on the bonds.

The risks with stocks and bonds are that their prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with stocks are market risk and company specific risk. The price of a stock can decline due to company-specific reasons as well as the health of the overall stock market. Even dividends, which many beginning investors believe are guaranteed payments by the company, can decline or be totally eliminated.

Item 9 - DISCIPLINARY INFORMATION

There is no reportable disciplinary information required for CCAM or its management persons that is material to your evaluation of CCAM, its business or its management persons.

Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

As previously stated, Advisory Representatives are dually registered as an advisory representative of CCAM and as a registered representative of Gėneos Wealth Management (Gėneos). You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, transaction fees may be earned in addition to any fees paid for advisory services. Transaction fees may be higher or lower at Gėneos than at other broker/dealers. Advisory Representatives may have a conflict of interest in having you purchase securities and/or insurance related products through Gėneos in that the higher their production with Gėneos the greater potential for obtaining a higher pay-out on transaction fees earned.

Under the rules and regulations of the FINRA, Gėneos has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of Gėneos. For such supervisory functions, CCAM may pay Gėneos a portion of the advisory fees they receive. Gėneos and CCAM are not affiliated.

CCAM is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, CCAM is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

CCAM attempts to mitigate the conflicts of interest with the potential receipt of transaction fees if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and may implement recommendations through other financial professionals. Furthermore, as a registered representative with Gėneos, Advisory Representatives are subject to a supervisory structure at Gėneos for his securities business.

As stated under Item 4, *Advisory Business* above, CCAM recommends other investment advisers (i.e. third party managers). A portion of the fee you pay will be used by CCAM to pay the third party investment adviser or manager. As further described under Methods of Analysis, Investment Strategies and Risk of Loss, CCAM selects third party managers based on several

criteria including cost, type of management, past history, ability to meet a need and provide a unique service. Since the fee charged to you is based on the value of your portfolio, all parties have an incentive to work toward performance goals and objectives. Consequently, if the third party manager does not adequately manage your account and the value of your portfolio goes down, so does the third party manager's and CCAM's compensation.

CCAM is licensed as an insurance agency and your investment adviser representative is licensed as an insurance agent. You may work with your investment adviser representative in his or her separate capacity as an insurance agent. When acting in his or her separate capacity as an insurance agent, the investment adviser representative may offer, for transaction fees, general disability insurance, life insurance, annuities, and other insurance products to you. As such, your investment adviser representative in his or her separate capacity as an insurance agent, may suggest that you implement recommendations of CCAM by purchasing disability insurance, life insurance, annuities, or other insurance products. This receipt of transaction fees creates an incentive for the representative to recommend those products for which your investment adviser representative will receive a transaction fee in his or her separate capacity as an insurance agent. Consequently, the advice rendered to you could be biased. You are under no obligation to implement any insurance or annuity transaction through your investment adviser representative.

As described in Item 5, if an insurance product is sold by CCAM to client and/or retirement plan client receiving our services and/or retirement plan services, any transaction fees received by CCAM from the insurance company will be offset against CCAM's contractual stated fee charged the client and/or Plan.

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

Code Of Ethics

- A. CCAM has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. CCAM takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as CCAM's policies and procedures. Further, CCAM strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with CCAM's Privacy Policy. As such, CCAM maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, CCAM's Code of Ethics establishes CCAM's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.
- B. Neither CCAM nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.
- C. CCAM and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, CCAM and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to

you. CCAM and its associated persons will not put their interests before your interest. CCAM and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.

- D. CCAM is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. CCAM and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

Prohibition on Use of Insider Information

CCAM has adopted policies and procedures to prevent the misuse of “insider” information (i.e. material non-public information). A copy of such policies and procedures is available to any person upon request.

Item 12 - BROKERAGE PRACTICES

As previously stated, Advisory Representatives are registered representatives of Gěneos. As a result they are subject to FINRA Conduct Rule 3040 which may restrict them from conducting securities transactions away from Gěneos unless Gěneos provides them with written authorization. Advisory Representatives have obtained approval to offer you the ability to maintain accounts through Fidelity Brokerage Services, Inc. (“Fidelity”), Schwab Institutional division of Charles Schwab & Co., Inc. (“Schwab”), and Pershing LLC (“Pershing”). All of which are registered broker/dealers, members SIPC. CCAM is independently owned and operated and not affiliated with Fidelity, Schwab or Pershing.

You are advised that not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer. However, the services provided by CCAM will be limited to only advice and will not include implementation.

In initially selecting Gěneos, Fidelity, Schwab, and Pershing CCAM conducted due diligence. CCAM’s evaluation and criteria includes:

- Ability to service you
- Staying power as a company
- Industry reputation
- Ability to report to you and to CCAM
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness
- Other factors that may bear on the overall evaluation of best price and execution

Additionally, periodically CCAM will review transaction costs in light of current market circumstances, available published statistical analysis as well as other relevant information.

Best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

You are advised there is an incentive for CCAM and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

Fidelity

The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist CCAM in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting. Fidelity also offers other services intended to help CCAM manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom CCAM may contract directly.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

Fidelity is providing CCAM with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

Services That Benefit You.

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

Services That May Not Directly Benefit You.

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

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

Services That Generally Benefit Only Us.

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

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, and insurance providers

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

Schwab and Pershing offer and/or operate similarly as Fidelity as described above.

Gěneos

Gěneos has a wide range of approved securities products for which Gěneos performs due diligence prior to selection. Gěneos' registered representatives are required to adhere to these products when implementing securities transactions through Gěneos. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. Gěneos also provides Advisory Representatives, and therefore the CCAM, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and CCAM manage and further develop its business enterprise.

Gěneos and its clearing broker/dealer, Pershing, LLC also make available to CCAM other products and services that benefit CCAM but may not directly benefit you. Some of these other products and services assist CCAM with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of CCAM's fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of CCAM 's accounts, including accounts not held through Gěneos.

Services That Generally Benefit Only Us: Gěneos also offers other services intended to help us manage and further develop our business enterprise. These services include: Educational conferences and events, Consulting on technology, compliance, legal, and business need, Publications and conferences on practice management and business succession and Access to employee benefits providers, human capital consultants, and insurance providers.

Block Trading

CCAM does not aggregate, batch or combine purchases and sales and other transactions made for the Account with purchases and sales and other transactions in the same or similar securities or instruments for other clients of CCAM. CCAM's policy is to implement all client orders on an individual basis. CCAM will endeavor to process all Account transactions in a timely

manner, but CCAM neither represents nor warrants that any such transaction will be processed or effected by the qualified custodian or broker-dealer on the same day as requested. For a description of Sub-Adviser's block trading policy, Client should refer to Sub-Adviser's Form ADV Part 2A Brochure.

Item 13 - REVIEW OF ACCOUNTS

Privately Managed Portfolio Program

Accounts are reviewed according to the client's stated guidelines or in response to requests. In the absence of guidelines, account reviews are conducted on a quarterly basis by CCAM's financial consultant. Investment advisory accounts are reviewed by Robert E. Nixon, principal executive officer of CCAM.

CCAM provides PMP clients with comprehensive reports, detailing performance, asset allocation breakdowns, and holdings. The report reflects the account's performance during the preceding quarter in terms of realized gains and losses, time weighted rate of return and compares the account's performance to selected market indices. CCAM selects the comparative indices based on the client's investment objectives and the investment manager's style. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail. Additionally, CCAM clients will receive ongoing and periodic reports of activity in their accounts from the client's custodial broker/dealer. These reports include transaction confirmations, monthly statements itemizing account activity and all securities held in custody.

You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him review the portfolio allocation and make recommendations for changes.

If you are participating in Financial Planning and Consulting Services you will not receive regular reviews. CCAM recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Other than the initial plan or analysis, there may be no other reports issued.

Invest RX – A Digital Advisor Program

Client accounts are reviewed at least quarterly by an investment adviser representative of CCAM. Additional reviews are conducted as requested by Client and/or when Client notifies CCAM of change of circumstance. Client will receive statements of Account from the qualified custodian(s) at least quarterly. In addition, Client will have access to limited performance reporting and financial planning tools which are made available through eMoney Advisors, LLC, an unaffiliated service provider, on the Digital platform.

Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION

- A. Product vendors recommended by CCAM may provide monetary and non-monetary assistance with client events, provide educational tools and resources. CCAM does not

select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. CCAM's due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and CCAM.

- B. CCAM may enter into arrangements with individuals ("Solicitor") whereby the Solicitor will refer clients who may be a candidate for investment advisory services to CCAM. In return, CCAM will agree to compensate the Solicitor for the referral. Compensation to the Solicitor is dependent on the client entering into an advisory agreement with CCAM for advisory services. Compensation to solicitor will be an agreed upon percentage of CCAM's advisory fee. CCAM's referral program is in compliance with the federal regulations as set out in 17 CFR Section 275.206(4)-3. The solicitation/referral fee is paid pursuant to a written agreement retained by both the investment adviser and the solicitor. The Solicitor will be required to provide the client with a copy of CCAM's Disclosure Brochure and a Solicitor Disclosure brochure prior to or at the time of entering into any investment advisory contract with CCAM. Solicitor is not permitted to offer clients any investment advice on behalf of CCAM. Clients' advisory fee will not be increased as a result of compensation being shared with Solicitor.

Item 15 - CUSTODY

With the exception of deduction of CCAM's advisory fees from your accounts, CCAM does not take custody of your funds or securities.

Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian monthly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

Item 16 - INVESTMENT DISCRETION

You may grant CCAM authorization to manage your account on a discretionary basis. Discretionary authority will give CCAM the authority to buy, sell, exchange, convert securities in your managed accounts. You will grant such authority to CCAM by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by CCAM.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) CCAM requires the use of the broker/dealer with which your Advisory Representative is registered for sales in commissionable mutual funds or variable annuities, if you elect to implement recommendations through your Advisory Representative;
- 4) With the exception of deduction of CCAM's advisory fees from the account, if you have authorized automatic deductions, CCAM will not have the ability to withdraw your funds or securities from the account.

Invest RX – A Digital Advisor Program

You will grant CCAM discretionary authority (without first consulting with you) to establish and/or terminate a relationship with a Sub-Adviser for purposes of managing the Account or a portion of the Account determined by CCAM. You also grant the Sub-Adviser selected by CCAM with the discretionary authority (in the sole discretion of the Sub-Adviser without first consulting with you) to make all decisions to buy, sell or hold securities, cash or other investments for such portion of the Account managed by the Sub-Adviser. You also grant the Sub-Adviser selected by CCAM with the power and authority to carry out these decisions by giving instructions, on your behalf, to brokers and dealers and the qualified custodian(s) of the Account. You authorize CCAM to provide a copy of your Client Agreement to the qualified custodian or any broker or dealer, through which transactions will be implemented on your behalf, as evidence of Sub-Adviser's authority under the Agreement.

In addition, you may grant CCAM discretionary authority to select, modify or replace your investment in a Sub-Adviser's investment model with a different model as CCAM deems appropriate due to (i) administrative reasons, such as unavailability of a model portfolio, (ii) changes in Client's stated investment objective and risk tolerance as communicated by Client, or (iii) to substitute a substantially similar model portfolio. When participating in the *Invest RX* program, you will grant CCAM the authority to utilize the automated trading and rebalancing features of the Digital Platform.

Item 17 - VOTING CLIENT SECURITIES

CCAM does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact CCAM about questions you may have and/or opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

With respect to any assets subject to sub-advisory services, CCAM does not perform proxy-voting services on your behalf. You will need to refer to each Sub-Adviser's disclosure brochure to determine whether Sub-Adviser will vote proxies on your behalf. You may request a complete copy of Sub-Adviser's proxy voting policies and procedures as well as information on how your proxies were voted by contacting CCAM.

Item 18 - FINANCIAL INFORMATION

- A. CCAM will not require you to prepay more than three months in advance of receiving the advisory service.
- B. As stated above, CCAM has discretionary authority over client accounts; however that authority does not extend to the withdrawal of any client assets, with the exception of deduction of CCAM's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.

C. Neither CCAM nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

Item 19 - REQUIREMENTS FOR STATE REGISTERED ADVISERS

This section is not applicable to CCAM. CCAM is not state registered. CCAM is registered with the Securities and Exchange Commission.

BROCHURE SUPPLEMENT

Robert Nixon

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March 2020

This brochure supplement provides information about Robert Nixon that supplements the Capital Consulting & Asset Management brochure. You should have received a copy of that brochure. Please contact Amber Roemer, Chief Compliance Officer, if you did not receive Capital Consulting & Asset Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Robert Nixon is available on the SEC's website at www.adviserinfo.sec.gov.

Robert Nixon, CFP®

Educational Background and Business Experience

Year of Birth: 1954

Education:

Name of School	Years Attended	Degree or Designation
College for Financial Planning	1989 to 1991	CFP

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Capital Consulting & Asset Management	Registered Investment Advisor	President, Financial Advisor	05/1996 to Present
Geneos Wealth Management, Inc.	Broker/Dealer	Registered Representative	04/2009 to Present
Cambridge Investment Research, Inc.	Broker/Dealer	Registered Representative	06/1997 to 03/2009

Disciplinary Information

Robert Nixon is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him within the most recent 10 years.

Other Business Activities

Robert Nixon is dually registered as an advisory representative of Capital Consulting & Asset Management ("CCAM") and as a registered representative of Geneos Wealth Management, Inc., a registered broker/dealer, member of the Financial Industry Regulatory Association and SIPC. Clients are under no obligation to purchase or sell securities through Robert Nixon. Geneos Wealth Management, Inc. and CCAM are not affiliated. Robert is an independent contractor of Geneos Wealth Management, Inc.

Robert may recommend clients implement recommendations through Geneos Wealth Management, Inc. If the clients implement investment recommendations through Geneos Wealth Management, Inc. on a non-fee basis, Robert will receive a transaction fee. Additionally, as further disclosed in the Disclosure Brochure under the section entitled Fees and Compensation, Robert may receive trail compensation for investments directed through Geneos Wealth Management, Inc. Therefore, there is a conflict of interest to cause a client to direct certain securities business through Geneos Wealth Management, Inc.

Additionally, Robert is a licensed insurance agent. You are not obligated to purchase insurance or securities products through Robert. However, if you implement insurance recommendations through him, he will receive transaction fees. The insurance business is a minority of his business and the amount of income he receives from insurance business fluctuates depending on the amount of business volume. You are advised there may be other insurance products and services available through other insurance professionals at a lower cost than those products available through Robert. If Robert receives any other compensation for such services, she will offset that compensation against CCAM's stated fee. Upon Request, CCAM will disclose the amount of the compensation, the services rendered for such compensation and the payer of such compensation.

It is important clients refer to the disclosures under Brokerage Practices in the Disclosure Brochure.

Robert allocates less than 10% of his time to the securities activities through Geneos Wealth Management, Inc. and less than 10% of his time to insurance products and services.

Robert is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents more than 10 percent of his time and income.

Additional Compensation

Clients are advised the amount of transaction fees paid by Geneos Wealth Management, Inc. to Robert can fluctuate based on his overall production. Therefore, the more business placed by Robert through Geneos Wealth Management, Inc. can enable Robert to reach another threshold enabling him to earn a higher payout.

Robert Nixon does not receive any economic benefit (i.e. sales awards and other prizes) for providing advisory services from a non-client.

Supervision

Supervision and oversight of the activities conducted through CCAM is conducted by Amber Roemer, Chief Compliance Officer of CCAM. Amber Roemer can be contacted at (888) 818-CCAM (2226) (toll free) or (402) 477-2500. Amber Roemer oversees the management in clients' accounts and the activities of the investment adviser. Amber Roemer has procedures in place to be aware of any outside business activities engaged in by Robert, oversee communications with the public, and review personal trading activities of Robert. Further, a written code of ethics and policies and procedures has been implemented. Supervised persons are required to acknowledge their agreement to comply with the code of ethics and policies and procedures.

As a registered representative of Geneos Wealth Management, Inc., Robert is subject to oversight by Geneos Wealth Management, Inc. over all his securities activities, insurance activities, Investment Advisor activities and certain outside business activities. Such oversight includes review of Robert's securities business to ensure he appears to be conducting suitable transactions.

Requirements for State-Registered Advisers

This section is not applicable to CCAM. CCAM is a federally registered investment adviser.

BROCHURE SUPPLEMENT

Amber Roemer

**Capital Consulting & Asset Management
140 North 8th Street, Suite 410, The Apothecary
Lincoln, NE 68508
(888) 818-CCAM (2226) Toll Free
(402) 477-2500 Phone
(866) 884-8816 Fax
CCAM@CCAM.net**

March 2020

This brochure supplement provides information about Amber Roemer that supplements the Capital Consulting & Asset Management brochure. You should have received a copy of that brochure. Please contact Amber Roemer, Chief Compliance Officer, if you did not receive Capital Consulting & Asset Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Amber Roemer is available on the SEC's website at www.adviserinfo.sec.gov.

Amber Roemer

Educational Background and Business Experience

Year of Birth: 1984

Education:

Name of School	Years Attended	Degree or Designation
College for Financial Planning	2010	Financial Paraplanner Qualified Professional
Doane College	2005-2009	Masters of Arts in Management

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Capital Consulting & Asset Management	Registered Investment Advisor	Financial Advisor	08/2015 to Present
Capital Consulting & Asset Management	Registered Investment Advisor	Chief Compliance Officer	04/2012 to Present
Capital Consulting & Asset Management	Registered Investment Advisor	Client Service Manager	05/2008 to Present
Bankers Life & Casualty Co.	Insurance Company	Insurance Agent	10/2007 to 04/2008
Security First Bank	Bank	Bank Teller	07/2005 to 04/2007

Disciplinary Information

Amber Roemer is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of her or the services offered by her within the most recent 10 years.

Other Business Activities

Amber is a licensed insurance agent. You are not obligated to purchase insurance or securities products through Amber. However, if you implement insurance recommendations through her, she will receive transaction fees. The insurance business is a minority of her business and the amount of income she receives from insurance business fluctuates depending on the amount of business volume. You are advised there may be other insurance products and services available through other insurance professionals at a lower cost than those products available through Amber. If Amber receives any other compensation for such services, she will offset that compensation against CCAM's stated fee. Upon Request, CCAM will disclose the amount of the compensation, the services rendered for such compensation and the payer of such compensation.

It is important clients refer to the disclosures under Brokerage Practices in the Disclosure Brochure.

Amber allocates less than 10% of her time to insurance products and services.

Amber is not actively engaged in any other investment-related business or occupation. Further, she is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents more than 10 percent of his time and income.

Additional Compensation

Amber Roemer does not receive any economic benefit (i.e. sales awards and other prizes) for providing advisory services from a non-client.

Supervision

Supervision and oversight of the activities conducted through CCAM is conducted by Amber Roemer, Chief Compliance Officer of CCAM and also by Robert Nixon. Amber and Robert can be contacted at (888) 818-CCAM (2226) (toll free) or (402) 477-2500. Amber Roemer oversees the management in clients' accounts and the activities of the other investment adviser. Amber Roemer has procedures in place to be aware of any outside business activities engaged in by Robert, oversee communications with the public, and review personal trading activities of Robert. Further, a written code of ethics and policies and procedures has been implemented. Supervised persons are required to acknowledge their agreement to comply with the code of ethics and policies and procedures.

As a registered representative of Geneos Wealth Management, Inc., CCAM is subject to oversight by Geneos Wealth Management, Inc. over all securities activities, insurance activities, Investment Advisor activities and certain outside business activities. Such oversight includes review of CCAM's securities business to ensure CCAM is conducting suitable transactions.

Requirements for State-Registered Advisers

This section is not applicable to CCAM. CCAM is a federally registered investment adviser.

BROCHURE SUPPLEMENT

Austin Costello

**Capital Consulting & Asset Management
140 North 8th Street, Suite 410, The Apothecary
Lincoln, NE 68508
(888) 818-CCAM (2226) Toll Free
(402) 477-2500 Phone
(866) 884-8816 Fax
CCAM@CCAM.net**

March 2020

This brochure supplement provides information about Austin Costello that supplements the Capital Consulting & Asset Management brochure. You should have received a copy of that brochure. Please contact Amber Roemer, Chief Compliance Officer, if you did not receive Capital Consulting & Asset Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Austin Costello is available on the SEC's website at www.adviserinfo.sec.gov.

Austin Costello, AAMS® and CFP®

Educational Background and Business Experience

Year of Birth: 1992

Education:

Name of School	Years Attended	Degree or Designation
College for Financial Planning	2018-2020	Certified Financial Planner, CFP®
College for Financial Planning	2018	Accredited Asset Management Specialist
University of Nebraska - Lincoln	2011-2015	Bachelor of Science in Civil Engineering

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
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- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of

care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Capital Consulting & Asset Management	Registered Investment Advisor	Financial Advisor	04/2019 to Present
The Compass Wealth Group	Investment Advice	Financial Advisor	05/2017 to 05/2019
Wilson & Company	Engineering	Civil Engineer	05/2015 to 05/2017
Olsson Associates	Engineering	Civil Engineering Intern	06/2013 to 05/2015
Midwest Roadside Safety Facility	Research & Design firm	Research Assistant	05/2011 to 06/2013

Disciplinary Information

Austin Costello is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of her or the services offered by her within the most recent 10 years.

Other Business Activities

Austin is a licensed insurance agent. You are not obligated to purchase insurance or securities products through Austin. However, if you implement insurance recommendations through him, he will receive transaction fees. The insurance business is a minority of his business and the amount of income he receives from insurance business fluctuates depending on the amount of business volume. You are advised there may be other insurance products and services available through other insurance professionals at a lower cost than those products available through Austin. If Austin receives any other compensation for such services, he will offset that compensation against CCAM's stated fee. Upon Request, CCAM will disclose the amount of the compensation, the services rendered for such compensation and the payer of such compensation.

It is important clients refer to the disclosures under Brokerage Practices in the Disclosure Brochure.

Austin allocates less than 10% of his time to insurance products and services.

Austin is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents more than 10 percent of his time and income.

Additional Compensation

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Requirements for State-Registered Advisers

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