

Part 2A of Form ADV: Firm Brochure

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March 17, 2020

This brochure provides information about the qualifications and business practices of Jolley Asset Management, LLC, a registered investment advisory firm. If you have any questions about the contents of this brochure, please contact us at 252 451-1450 or [tsapp@jolleyasset.com](mailto:tsapp@jolleyasset.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. The firm's registration with the SEC does not imply any level of skill or training by our firm or officers.

Additional information about Jolley Asset Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 113600.

## Item 2 Material Changes

This Firm Brochure, dated March 17, 2020, is an update to our annual disclosure document dated 3/8/19.

This item will be used to provide our clients with a summary of all material changes to the information contained in this document since the date of our last annual updating amendment.

Since the last annual amendment, the following material changes were made:

- **Item 4 – Advisory Business** was amended to disclose Jolley Asset Management is in the process of being acquired by another registered investment adviser located in North Carolina. Clients of Jolley Asset Management, LLC are not expected to see any material differences to the way their accounts are managed or to any related service provided by the firm. To obtain additional information about this process, clients may contact us by calling (252) 451-1450.
- **Item 4 – Advisory Business** was amended to reflect Jolley Asset Management's regulatory assets under management.

A copy of Jolley Asset Management's Brochure may be requested by contacting the firm at (252) 451-1450. Jolley Asset Management will provide a copy of its current brochure at any time without charge.

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#### **Item 4 Advisory Business**

Jolley Asset Management, LLC is a SEC-registered investment adviser with its principal place of business located in Rocky Mount, North Carolina. Jolley Asset Management, LLC began conducting business in 1998.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 10% or more of this company).

- Frank G. Jolley, President and Member

- William A. Vogel, Member

- William H. Collier, IV, Member

The firm is in the process of being acquired by another registered investment adviser located in North Carolina. Clients of Jolley Asset Management, LLC are not expected to see any material differences to the way their accounts are managed or to any related services provided by the firm. If you would like additional information about this, you may contact us by calling (252) 451-1450.

#### **INDIVIDUAL PORTFOLIO MANAGEMENT**

Jolley Asset Management, LLC, (hereinafter "JAM") provides the following advisory services to its clients: Portfolio Management Services:

JAM provides investment supervisory services, defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, JAM develops a client's personal investment strategy and creates and manages a portfolio based on that strategy. JAM provides this service to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and corporations. JAM will manage advisory accounts on a discretionary basis. Account supervision is guided by the stated objectives of the client (i.e., growth, growth and income, and income).

A) JAM Individually Managed Accounts - These accounts will be managed based upon the investment objective of the client as described in the above paragraph. These accounts will be invested predominately in individual equity securities, exchange traded funds and/or taxable or tax-free bonds and money market funds or a combination thereof in the case of balanced objectives. For advisory accounts, JAM will ensure that the following conditions are met and maintained:

- 1) JAM will manage each client's account on the basis of the client's financial situation and investment objective and any reasonable investment restrictions the client may impose;

- 2) JAM will obtain sufficient client information to be able to provide individualized investment advice to the client. Periodically, JAM will contact the client to determine whether there have been any changes in the client's financial situation or investment objectives and whether the client wishes to impose investment restrictions or modify existing restrictions;
- 3) JAM will be reasonably available to consult with the client;
- 4) Each client is able to impose reasonable investment restrictions on the management of the account;
- 5) Each client will receive a quarterly statement with a description of all account activity; and,
- 6) Each client will retain certain indicia of ownership of the securities and funds in the account, e.g., the ability to withdraw securities, vote securities, among others.

Advisory clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors, and any such restrictions or changes are to be in writing.

Once the client's portfolio has been established, we review the portfolio on an ongoing basis, and if necessary, rebalance the portfolio, based on the client's individual needs and objectives.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Exchange-traded funds
- Foreign issuers
- Warrants
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- Mutual fund shares
- United States government securities

Because some types of investments involve certain additional degrees of risk, they will only be implemented when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

B) JAM Fund Model Accounts - JAM manages investment advisory accounts utilizing mutual funds and ETFs. JAM provides this service to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and corporations. Account supervision is guided by the stated objectives of the client (i.e., equity, equity-tilted balanced, balanced and conservative balanced). Each portfolio is designed to meet a particular investment goal which JAM has determined is suitable to the client's circumstances. However, each client will have the opportunity to place reasonable restrictions on the types of investments to be

held in the portfolio.

C) Sub-Advisory Services: JAM also provides discretionary sub-advisory services to clients of Wilbanks Smith & Thomas Asset Management, LLC, (WST) a registered investment advisory firm based in Norfolk, VA. WST may retain JAM to manage all or a portion of WST client assets sub-advised by JAM. JAM's sub-advisory services are consistent with the firm's advisory services for Individually Managed Accounts and based on the investment objective of the client as described above for the sub-advised clients subject to limitations imposed by the client's objectives and other regulatory limitations.

D) JAM also offers an automated investment program (the "Program") through which clients are invested in a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange-traded funds ("ETFs") and a cash allocation. The client may instruct JAM to exclude up to three ETFs from their portfolio. The client's portfolio is held in a brokerage account opened by the client at Charles Schwab & Co., Inc. ("CS&Co"). JAM uses the Institutional Intelligent Portfolios® platform ("Platform"), offered by Schwab Performance Technologies ("SPT"), a software provider to independent investment advisors and an affiliate of CS&Co., to operate the Program. JAM is independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co., or their affiliates (together, "Schwab").

JAM, and not Schwab, is the client's investment advisor and primary point of contact with respect to the Program; and is solely responsible for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis.

JAM has contracted with SPT to provide the Platform, which consists of technology and related trading and account management services for the Program. The Platform enables the Program to be made available to clients online and includes a system that automates certain key parts of JAM's investment process (the "System"). The System includes an online questionnaire that helps JAM determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio.

Clients should note that JAM will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but JAM then makes the final decision and selects a portfolio based on all the information the client has provided. The System also includes an automated investment engine through which JAM manages the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

JAM charges clients a fee for services as described below under Item 5 Fees and Compensation. JAM fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to CS&Co. as part of the Program. Schwab does receive other revenues in connection with the Program. JAM does not pay SPT fees for the Platform so long as \$100 million in client assets in accounts that are not

enrolled in the Program is maintained at CS&Co. If this condition is not met, then JAM pays SPT an annual licensing fee of 0.10% (10 basis points) on the value of clients' assets in the Program. This fee arrangement gives JAM an incentive to recommend or require that clients with accounts not enrolled in the Program be maintained with CS&Co.

Communication is primarily conducted through electronic channels, however, JAM portfolio managers are also available to consult with clients in person.

E) Financial Planning Services: JAM offers financial planning services, which generally begins with extensive data gathering and defining the economic goals the client wishes to obtain. JAM typically analyzes the client's present financial situation, including but not limited to a review of assets and liabilities; current and projected income; and any existing investment portfolio, if appropriate. JAM will then provide a written or verbal analysis and plan for managing the assets. This analysis will consider the needs and objectives of the client and suggest appropriate investment strategies consistent with these needs and objectives.

JAM may provide advice on issues relating to income, investments, retirement planning, college funding, tax planning, estate planning, securities, risk management issues, and business issues. Information gathered for review and assessment may include: wills, trust agreements, fringe benefit programs (explanation of and current status), tax returns, business agreements, insurance policies and programs (including life, disability and medical), past and current investments (including cost basis, present value, purpose of investments and tax ramifications), investment objectives, income, expenses, obligations, financial goals, names and relationships of other advisors (e.g., attorney, accountant, banker, etc.), family background and composition, and circumstances which may have an effect on the client's financial situation. JAM provides these services at no additional cost to Clients.

#### **AMOUNT OF MANAGED ASSETS**

As of December 31, 2019, our regulatory assets under management were approximately \$283,069,176.00 million of clients' assets on a discretionary basis.

## Item 5 Fees and Compensation

### **PORTFOLIO MANAGEMENT SERVICES FEES**

The annualized fee for Portfolio Management Services will be charged as a percentage of assets under management, according to the following schedule:

#### A) JAM Individually Managed Accounts

Assets Under Management	Annual Fee
First \$500,000	1.25%
Next \$500,000	1.0%
Next \$1,000,000	.75%
\$2,000,000 and over	Negotiable

A minimum of \$250,000 of assets under management may be required for this service. This account size may be negotiable under certain circumstances. JAM may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

#### B) JAM Fund Model Accounts

Assets Under Management	Annual Fee
First \$500,000	.50%



Over \$500,000	.35%
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A minimum of \$20,000 of assets under management may be required for this service. This account size may be negotiable under certain circumstances. JAM may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Fees are billed quarterly in arrears based upon the market value of the assets at the end of the preceding quarter. If your relationship with us is begun or ended during a calendar quarter, your fee will be prorated for the appropriate number of days completed or remaining in the quarter.

We may negotiate the amount of your fee depending upon circumstances including but not limited to account composition and complexity, other client, employee or family relationships, etc. which may result in different fees being charged by us for client accounts similar in composition and objectives.

You may pay your fee directly upon receipt of an invoice from us or you may authorize your custodian to allow us to directly debit our fee from your account or accounts. If you choose the latter method, your custodian will not confirm our fee but will pay the amount based on the fee amount communicated to the custodian by us and send it directly to us. You will receive a periodic statement from your custodian which will include the amount of the fee which has been sent to us. You should confirm the accuracy of our fee calculation upon receipt of your custodian's statement.

Reduced fees, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

The fees you pay us do not include brokerage commissions or other fees or charges associated with securities transactions implemented with or through a brokerage firm, mark-ups or mark-downs in principal transactions, deferred sales charges, odd-lot differentials, stock exchange fees, wire transfer or related processing fees, transfer taxes or other charges mandated by law or regulation all of which will be charged to you in addition to our fee. We do not receive any portion of any of the foregoing expenses or fees. You should go to the section on Brokerage Practices in our brochure for more information related to that process.

#### C) Sub-Advisory Services

For the Sub-Advisory Services, JAM receives a percentage of the annual advisory fees, which generally range from 0.25% to 0.50%, of the market values of the client's assets managed by WST for the services provided and paid to JAM for its sub-advisory services. WST advisory fee schedules are disclosed in WST's Form ADV 2.

#### D) Automated Investment Program

Assets Under Management	Annual Fee
First \$100,000	.75%
Next \$150,000	.60%
Over \$250,000	.50%

As described in Item 4 Advisory Business, clients do not pay fees to SPT or brokerage commissions or other fees to CS&Co. as part of the Automated Investment Program. Schwab does receive other revenues in connection with the Program. Brokerage arrangements are further described below in Item 12 Brokerage Practices.

### **GENERAL INFORMATION**

**Termination of the Advisory Relationship:** A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice.

**Mutual Fund Fees:** All fees paid to JAM for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee for mutual funds. If the mutual fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund and/or ETF directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund and/or ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

**Grandfathering of Minimum Account Requirements:** Pre-existing advisory clients are subject to JAM's minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements and fee schedules will differ among clients.

**ERISA Accounts:** JAM is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) subject to the Employee Retirement Income and Securities Act (ERISA). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation.

**Advisory Fees in General:** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

## **Item 6 Performance-Based Fees and Side-By-Side Management**

**JAM does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client's account). Because JAM does not manage accounts that are charged a performance-based fee, JAM does not face the conflicts of interest that can arise in such situations.**

## **Item 7 Types of Clients**

Jolley Asset Management, LLC provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans (other than plan participants)
- Charitable organizations
- Corporations or other businesses not listed above
- Other - trust company

Clients eligible to enroll in the Automated Investment Program include individuals, IRAs, and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the Program. The minimum investment required to open an account in the Program is \$5,000.00. The minimum account balance to enroll in the tax-loss harvesting feature is \$50,000.

*- See Item 5 Fees and Compensation for minimum account size requirements.*

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

### **METHODS OF ANALYSIS**

#### **Fundamental Analysis**

In making portfolio decisions, we typically utilize fundamental analysis; which involves analyzing the company balance sheet, income statement, management and the company's competitive advantages in the market place. We also consider the overall state of the economy, interest rates and attempt to determine whether the company's underlying prospects will be impacted positively or negatively by those economic trends.

#### **Equity Investments**

In managing portfolios, we utilize a value approach where we attempt to find companies that we believe trade at a significant discount to their estimated intrinsic value, with the expectation that over a

reasonable time period, the discount will narrow or disappear. Investments are made with the concept of a “margin of safety”, which we believe lessens the chance of a permanent loss of capital. Balance sheet strength is considered to be equally important to income statement trends when analyzing companies. As a value investor, we are typically looking for companies with low price/earnings ratios, low price/sales ratios or low price/book value ratios. When looking at companies we also consider its current valuation versus its historical valuation levels and other companies in the same or similar industries. Additional focus or attention is paid to the cash flow generation of the company and the company’s dividend history. Risks to any equity holding (and/or portfolio) may arise due to deteriorating fundamentals related to the economy, poor capital asset allocation decisions by management and or a weakening competitive position. Technological obsolescence can also happen in today’s rapidly changing environment. While we monitor portfolio holdings on an ongoing basis, there can be no assurance that our analysis will always be correct in our decision to buy, sell or hold a particular security.

Our fundamental analysis typically does not attempt to anticipate market movements. We are not market timers. This represents a potential risk as an equity holding or portfolio decline could be attributed to market forces rather than due to specific company risk factors. Diversification by company, sector and industry can help reduce specific company risk but not eliminate market volatility.

#### Fixed Income Investments

Taxable bond portfolios are diversified by company, industry and sector to prevent the portfolio from being susceptible to downturns in certain sectors of the economy. We also focus on the various rating agencies to help determine the quality of the bond portfolio and whether trends are improving or deteriorating. A credit quality decline may result in elimination of a bond from our portfolios if we believe the risk has become unsuitable for the client. Municipal bond portfolios are typically concentrated in higher quality general obligation issues which are backed by the full power and taxing authority of the issuing municipality. The major rating agencies are also used when selecting bonds for client portfolios. Once again if the credit quality of a particular issue is declining, we may consider eliminating the holding from client portfolios. Our analysis, as well as that by the rating agencies, may misjudge a company or municipality which could result in a declining bond price or potential default by the issuer. In all bond portfolios (taxable and non-taxable) particular attention is paid to the duration and average maturity of the portfolio as longer dated issues will be subject to price declines in the event of a rising interest rate environment.

#### Asset Allocation

We believe asset allocation is an important factor in managing risk in client portfolios. We meet with clients in an attempt to determine their long-term goals, risk tolerance, time horizon, tax constraints, income needs and other factors to arrive at a particular asset allocation mix. Then we attempt to identify an appropriate ratio of equities, fixed income (bonds) and cash to help the client meet his/her long-term objectives with an appropriate level of risk. Balanced portfolios with exposure to stocks, bonds and cash are utilized for many clients who desire to take less risk than would be the case with an all equity portfolio. Risks of asset allocation could result from the client or the manager not properly identifying the true risk profile of the client. Furthermore, a client’s risk profile must be continuously monitored as their financial

situation and objectives can change, which could possibly result in a need to change the asset mix of the portfolio.

#### Mutual Fund and/or ETF Analysis

When utilizing mutual funds and/or exchange traded funds in portfolios we look at the experience and track record of the manager in an attempt to determine if the manager has demonstrated the ability to successfully invest over a period of time and in different economic conditions. We also examine the costs of the fund/ETF to determine if the management fees and expense ratios are reasonable and how they compare with their peer group. We also monitor the funds or ETFs in an attempt to determine if they are following their stated investment objective.

A risk of our mutual fund and/or ETF analysis is that past performance does not guarantee future results. A manager who has been successful in the past may not be able to replicate their success in the future. Further risks can arise due to a manager deviating from their stated objective or a manager change at the fund and/or ETF level. While we will attempt to monitor such events, the fund/ETF could decline before we might identify the fact that the fund/ETF has become less successful at meeting their stated objectives.

#### Holding Periods

We typically purchase securities with the idea of holding them in client portfolios for a year or longer. Taxation on long term gains (in taxable accounts) is lower than that on short term gains and we clearly attempt to take advantage of that for our clients. While our goal is to invest for periods longer than one year, there are times when we will sell securities from the client portfolio before the security gain or loss has become a long term gain or (loss). This could be the result of the company's stock becoming what we deem to be over-valued or it could be the result of what we believe to be a deteriorating fundamental issue that could result in a decline (or further decline) in the share price. In cases such as these we will likely sell the security with little regard as to the holding period. While this may be less advantageous from a tax standpoint we would be viewing the move as one to protect portfolio capital. More frequent trading will likely result in higher trading costs as well, which could be detrimental to long term returns.

Investing in securities such as the types of securities used by us in managing your assets or providing you investment advice involves the potential risk of loss in the value of the securities both in the amount invested in the securities as well as any profits which have not been realized by selling the securities. You should be prepared to bear the risk of such losses. The degree of risk depends upon the type of security or strategy involved.

#### **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable regulatory or disciplinary events to disclose.

#### **Item 10 Other Financial Industry Activities and Affiliations**

William A. Vogel, a minority owner and non-managing Member of JAM, is the President and Chief Executive Officer of Montag and Caldwell, Inc., a registered investment adviser, not affiliated with JAM. There are no referral arrangements between our firm and Montag and Caldwell, Inc. No JAM client is obligated to use the advisory services of Montag and Caldwell, Inc., as no Montag and Caldwell, Inc. advisory client is obligated to use our advisory services. Mr. Vogel will not provide investment advice on behalf of JAM. Policies and procedures have been instituted by JAM to ensure that Montag and Caldwell does not have knowledge of JAM's trades prior to implementation and vice versa.

JAM and WST may provide sub-advisory services to each other under written agreements and may refer potential clients to each other for investment management services for which JAM or WST will receive compensation as a sub-advisor, for its referral and / or sub-advisory services. Please refer to Item 4. Advisory Business and Item 14. Client Referrals and Other Compensation for additional information.

These relationships may create a conflict of interest on the part of each firm in referring clients or providing sub-advisory services to the other firm. JAM addresses this conflict by disclosing these relationships to clients and prospective clients in this brochure and in other written disclosures provided to clients.

Clients should be aware that the receipt of additional compensation by JAM and its owners, management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. JAM endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- We disclose to clients that they are not obligated to purchase recommended investments or investment products from our employees or affiliated companies;
- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- Our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are appropriate to the client's needs and circumstances;
- We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;

- We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

JAM and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the reporting and review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement). Our code also provides for oversight, enforcement and recordkeeping provisions.

JAM's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information, i.e., insider information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used or misused in any personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email to [tsapp@jolleyasset.com](mailto:tsapp@jolleyasset.com), or by calling us at (252)451-1450.

JAM and individuals associated with our firm are prohibited from engaging in principal and agency cross transactions. Such transactions present conflicts of interest with clients and are therefore prohibited.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

## **Item 12 Brokerage Practices**

For discretionary clients, JAM requires these clients to provide us with written authority to determine the broker-dealer to use.

JAM will aggregate trades where possible and when advantageous to clients. This aggregation of trades permits the trading of blocks of securities composed of assets from multiple client accounts, so long as transaction costs are pro-rated between all accounts included in any such block.

Block trading may allow us to execute equity trades in a timelier, more equitable and efficient manner, at an average share price. JAM will typically aggregate trades among clients whose accounts can be traded at a given broker, and generally will rotate or vary the order of brokers through which it places trades for clients on any particular day. JAM's block trading policy and procedures are as follows:

- 1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with JAM, or our firm's order allocation policy.
- 2) The portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
- 3) The portfolio manager must reasonably believe that the order aggregation will benefit and enable JAM to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a "20-20 hindsight" perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.
- 4) Prior to entry of an aggregated order, a written order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
- 5) If the order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated pro rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.
- 6) Generally, each client that participates in the aggregated order must do so at the average price for all



separate transactions made to fill the order. Under the client's agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client, the client account's asset size or other requirements.

- 7) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.
- 8) JAM client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for that account.
- 9) Funds and securities for aggregated orders are clearly identified on JAM's records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.
- 10) No client or account will be favored over another.

We have established a Best Execution Committee which periodically reviews our brokerage practices and the reasonableness of compensation or other remuneration paid to brokerage firms and monitors our efforts to see best execution of client transactions.

JAM may recommend that clients establish brokerage accounts with the Schwab Institutional Division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts.

### **The custodian and brokers we use**

JAM does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs").

### **How we select brokers/custodians**

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

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, etc.)
- Breadth of available investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see "Products and services available to us from Schwab")

### **Your brokerage and custody costs**

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account.

Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transactions fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. Also, Schwab charges you're a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab accounts. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to see "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians").

### **Products and services available to us from Schwab**

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

### **Schwab's support services:**

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

**Services that my not directly benefit you.** Schwab 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 Schwab's own and that of third parties. We may use this research to service all or a substantial number of our client's accounts including accounts not maintained at Schwab. In addition to investment research, Schwab also make 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 account
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' account
- Assist with back-office functions, recordkeeping, and client reporting

**Services that generally benefit only us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Education 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, human capital consultants, and insurance providers
- Marketing consulting and support

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

### **Our interest in Schwab's services**

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. This creates an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than bases on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients.

Our selection is primarily supported by the scope, quality, and price of Schwab's services {see "How we select brokers/custodians") and not Schwab's services that benefit only us. Client accounts enrolled in the Automated Investment Program are maintained at, and receive the brokerage services of, CS&Co., a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CS&Co. as custodian/broker to enroll in the Program, the client decides whether to do so and opens its account with CS&Co. by entering into a brokerage account agreement directly with CS&Co. JAM does not open the account for the client. If the client does not wish to place his or her assets with CS&Co., then JAM cannot manage the client's account through the Program. CS&Co. may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for JAM's clients and accounts for clients of other independent investment advisory firms using the Platform.

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab business serving independent investment advisory firms like JAM. Through Schwab Advisor Services, CS&Co. provides JAM and its clients, both those enrolled in the Program and not enrolled in the Program, with access to its institutional brokerage services trading, custody, reporting, and related services, many of which are not typically available to CS&Co. Institutional Intelligent Portfolios retail customers. CS&Co. also makes available various support services. Some of those services help JAM manage or administer client accounts, while others help JAM manage and grow business. CS&Co. support services described below are generally available on an unsolicited basis (JAM does not have to request them) and at no charge to us. The availability of CS&Co. products and services is not based on JAM giving particular investment advice, such as buying particular securities for clients.

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

paragraph generally benefit the client and the client's account.

The availability of services from CS&Co. is beneficial because JAM does not have to produce or purchase them. JAM does not have to pay for these services, and they are not contingent upon a commitment to any specific amount of business to CS&Co. in trading commissions or assets in custody. With respect to the Program, as described above under Item 4 Advisory Business, JAM does not pay SPT fees for the Platform so long as \$100 Million in client assets in accounts at CS&Co. that are not enrolled in the Program are maintained at Schwab. In light of these arrangements with Schwab, JAM may have an incentive to recommend that clients maintain their accounts with CS&Co. based on an interest in receiving Schwab's services that benefit JAM's business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. JAM believes, however, that the selection of CS&Co. as custodian and broker is in the best interests of clients. It is primarily supported by the scope, quality, and price of CS&Co.'s services and not Schwab's services that benefit only the firm. JAM has adopted policies and procedures designed to ensure that the use of Schwab's services is appropriate for each client.

**Trade Errors:** Errors in executing client transactions may occur from time to time which we will seek to correct on a timely basis so that you will not incur a loss or other costs as a result of any such errors. Any loss or costs incurred as a result of the corrections of such errors will be borne by us or by your broker/custodian while any market gains resulting from the correction of such errors will usually be retained by your broker/custodian or you.

### **Item 13 Review of Accounts**

As a registered adviser, and as a fiduciary to our advisory clients, JAM obtains substantial background information about each client's financial circumstances, investment objectives, and risk tolerance, among other things, through in-depth interviews and information gathering processes which includes client profile and relationship forms. Clients may also have and provide written investment policy statements or written investment guidelines that the firm reviews, approves and monitors as part of the firm's investment services, subject to any written revisions or updates received from a client. JAM reviews client portfolios on an ongoing basis with both client services personnel and portfolio managers working on a team approach.

JAM provides quarterly written reports to clients that include important information about the client's financial situation, portfolio holdings, values and transactions, among other things. JAM also provides performance information about the client account's performance, which also includes relevant market index or benchmark information.

Investment professionals may also schedule client meetings on a periodic basis, or request basis, to review a client's portfolio, performance, market conditions, financial circumstances, and investment objectives,

amount other things, to confirm that JAM's investment decisions and services are consistent with the client's objectives and goals. Meetings or reviews may also be triggered by market, economic or political changes, among others.

#### **Item 14 Client Referrals and Other Compensation**

JAM may from time to time enter into written agreements with other persons or companies who refer potential clients to us in exchange for a referral or solicitor fee which typically is a percentage of the fee we receive from the referred client for our services. This means that the persons or companies who refer potential clients to us as described will have a financial interest in your selecting us to provide you services. If you are referred to us through an arrangement like this, you will receive a written document which will disclose that we have an arrangement with the solicitor, any affiliation between us and the solicitor, and a description of the compensation the solicitor will receive from us if you establish an account with us. The fee we charge you for our services will not be increased as a result of our use of these referral arrangements.

In addition, JAM may pay referral fees to persons and companies (Please refer to Item 10. Other Financial Industry Activities and Affiliations for additional information) and we may also compensate our employees, including our portfolio managers, who refer potential clients to us for our services. Thus, the affiliated company and/or employee will have a financial interest in the selection of JAM by the client for investment management services.

While JAM and WST may refer prospective clients or clients to each under these referral arrangements, no prospective client is obligated to engage either JAM or WST for their respective advisory services and may select any adviser of their choice.

It is JAM's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

JAM receives an economic benefit from Schwab in the form of the support products and services it has made available. These products and services, how they benefit JAM, and the related conflicts of interest are described above under Item 12 Brokerage Practices. The availability to JAM of Schwab's products and services is not based on JAM giving particular investment advice, such as buying particular securities for clients.

## **Item 15 Custody**

Although all of our clients' assets are held with qualified custodians, we are deemed by the Securities and Exchange Commission ("SEC") to have custody of certain client assets due to our ability to directly debit our management fees from certain client custodial accounts, the extent of our "bill pay" services to certain clients, and our authorization to transfer client assets to certain third parties and/or to other accounts of certain clients based on written authorization from those clients. We have procedures in place to comply with applicable requirements of the SEC in such circumstances.

Consistent with appropriate guidelines, as part of this advisory client billing process, the client's custodian is advised of the amount and calculation of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions including deduction of advisory fees within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the fees, among other things. Clients should contact us directly and promptly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their qualified custodians, we also send account statements directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current and to notify us promptly of any discrepancy.

Under government regulations, JAM is deemed to have custody of a client's assets if the client authorizes JAM to instruct CS&Co. to deduct advisory fees directly from the client's account. This is the case for accounts in the Program. CS&Co. maintains actual custody of clients' assets. Clients receive account statements directly from CS&Co. at least quarterly. They will be sent to the email or postal mailing address the client provides to CS&Co. Clients should carefully review those statements promptly when received. JAM also urges clients to compare CS&Co.'s account statements to the periodic account statements clients receive from JAM.

## **Item 16 Investment Discretion**

We will accept discretionary investment authority over your assets if you agree to such an arrangement. This is typically accomplished through execution of a limited trading authority contained in your client agreement with us or through similar authority contained in a wrap fee arrangement you may execute with the brokerage firm which established the wrap fee arrangement. When executing your client agreement with us, you can further limit the extent of discretionary investment authority to be granted to us although this may impact the level of services we can provide you. You may also place restrictions on

our authority such as instructions not to make investment in certain industries or to not sell certain investment you may have due to possible adverse tax consequences to you.

### **Item 17 Voting Client Securities**

Generally, we vote proxies for all client accounts; however, you always have the right to vote proxies yourself. You can exercise this right by instructing us in writing to not vote proxies in your account.

We will vote proxies in the best interests of our clients and in accordance with our established policies and procedures. Our firm will retain all proxy voting records for the requisite period of time, including a copy of each proxy statement received, a record of each vote cast, a copy of any document created by us that was material to making a decision how to vote proxies, and a copy of each written client request for information on how the adviser voted proxies. If our firm has a conflict of interest in voting a particular action, we will notify the client of the conflict.

Clients may obtain a copy of our proxy voting policies and procedures by contacting Terry Sapp by telephone, email, or in writing. Clients may request, in writing, information on how proxies for his/her shares were voted. If any client requests a copy of our proxy policies and procedures or how we voted proxies for his/her account(s), we will promptly provide such information to the client.

With respect to ERISA accounts, we will vote proxies unless the plan documents specifically reserve the plan sponsor's right to vote proxies.

### **Item 18 Financial Information**

JAM has no additional financial circumstances to report and has not been the subject of a bankruptcy proceeding at any time since inception.

Under no circumstances does our firm require or solicit the pre-payment of fees in excess of \$1200 per client more than six months in advance of services rendered. In fact, all client billings are done in arrears.



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This brochure supplement provides information about Frank G. Jolley that supplements the Jolley Asset Management, LLC Firm Brochure. You should have received a copy of that brochure. Please contact Terry Sapp, Chief Compliance Officer, if you did not receive Jolley Asset Management, LLC's Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Frank G. Jolley is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational Background and Business Experience

Frank graduated from the University of North Carolina at Chapel Hill with a B. S. in Business Administration in 1979. Frank has served as President of Jolley Asset Management, LLC (JAM) since its formation in July, 1998. Prior to founding JAM, he was employed by Centura Bank, now a subsidiary of RBC Financial Group, as Vice-President and Portfolio Manager of the Trust/Investment area from October 1990 until July 1996 and as Chief Investment Officer of the Trust/Investment area from July 1996 until August, 1998. Frank received his Chartered Financial Analyst (CFA) designation in September 1994.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals.

There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

Place their clients' interests ahead of their own

- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders - often making the charter a prerequisite for employment. Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management,

and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org). Year of birth 1956.

**Item 3 Disciplinary Information**

Frank G. Jolley has no reportable disciplinary or regulatory events to disclose.

**Item 4 Other Business Activities**

Frank G. Jolley has no other business activities or affiliations to report and devotes all his business efforts and time to Jolley Asset Management, LLC.

**Item 5 Additional Compensation**

Frank G. Jolley receives no reportable additional compensation.

**Item 6 Supervision**

Frank Jolley, President, has overall responsibility for the management of the firm, supervision of the investment professionals and employees and setting business initiatives and strategies, among other things.

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This brochure supplement provides information about Terry W. Sapp that supplements the Jolley Asset Management, LLC Firm Brochure. You should have received a copy of that brochure. Please contact Frank Jolley, President, if you did not receive Jolley Asset Management, LLC's Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Terry W. Sapp is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational Background and Business Experience

Terry is Vice-President--Portfolio Manager, Controller and Chief Compliance Officer of Jolley Asset Management, LLC (JAM). She graduated from East Carolina University with a B.S. in Business Administration in 1985. Terry joined JAM in February 2004. Prior to joining Jolley Asset Management, LLC she was employed as a portfolio manager by the Raleigh, NC office of Voyageur Asset Management, Inc. a subsidiary of RBC Financial Group from January 2003 through January 2004. From June 1985 through December 2002, Terry was employed as a portfolio manager/trust investment operations manager by Centura Bank, also a subsidiary of RBC Financial Group. She received her Certified Public Accountant certificate in November 1994 and her Chartered Financial Analyst (CFA) designation in October 2003. The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals.

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### Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced

investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

Year of birth 1963.

### **Item 3 Disciplinary Information**

Terry W. Sapp has no reportable disciplinary or regulatory events to disclose.

### **Item 4 Other Business Activities**

Terry W. Sapp has no other business activities or affiliations to report and devotes all her business efforts and time to Jolley Asset Management, LLC.

### **Item 5 Additional Compensation**

Terry W. Sapp receives no reportable additional compensation.

### **Item 6 Supervision**

Terry W. Sapp is supervised by Frank G. Jolley, President and CIO of Jolley Asset Management, LLC. This supervision includes the investment advice that is provided to clients. Frank can be reached by calling (252)451-1450 ext. 1.

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This brochure supplement provides information about William (Bill) H. Collier, IV that supplements the Jolley Asset Management, LLC Firm Brochure. You should have received a copy of that brochure. Please contact Terry Sapp, Chief Compliance Officer, if you did not receive Jolley Asset Management, LLC's Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Bill Collier is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 Educational Background and Business Experience**

Bill graduated from the University of North Carolina at Chapel Hill in 1982. He began his investment career with Merrill Lynch in 1983 and was employed in the securities industry through 1996. In 1996, he started Pitkin Partners, LP (a domestic based long/short hedge fund), where he served as General Partner. In 2000, he joined Central Carolina Bank and Trust Company in the Trust and Investment Management division as a Vice President until October of 2007. There, he co-managed a publicly traded mutual fund from January 2002 until October, 2004. In October 2007, he joined Investors Trust Company, a subsidiary of Investors Title Company, as a Vice President and Principal. His primary responsibilities included portfolio management – managing large cap, core investment strategies for individual clients and institutional accounts. Prior to joining Jolley Asset Management, he was employed by First Tennessee Bank from August, 2015 through January, 2016.

Year of birth 1960.

## **Item 3 Disciplinary Information**

William H. Collier, IV has no reportable disciplinary or regulatory events to disclose.

## **Item 4 Other Business Activities**

William H. Collier, IV has no other business affiliations or activities to report and devotes all his business efforts to JAM.

## **Item 5 Additional Compensation**

William H. Collier, IV receives no reportable additional compensation.

## **Item 6 Supervision**

William H. Collier, IV is supervised by Frank G. Jolley, President and CIO of Jolley Asset Management, LLC. This supervision includes the investment advice that is provided to clients. Frank can be reached by calling (252)451-1450 ext. 1.



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This brochure supplement provides information about Jan P. Robillard that supplements the Jolley Asset Management, LLC Firm Brochure. You should have received a copy of that brochure. Please contact Terry Sapp, Chief Compliance Officer, if you did not receive Jolley Asset Management, LLC's Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Bill Collier is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 Educational Background and Business Experience**

Jan has been in the financial and client services business since 2003. Prior to joining Jolley Asset Management, she worked for Fidelity Investments from 2006 through 2015. While at Fidelity, Jan spent 6 years as a Service Delivery Manager where she managed a 401(k) and non-qualified team for senior executives and led 15-20 employees to provide world class customer service in a fast paced environment. Prior to leaving Fidelity, she worked in Public Affairs and Government Relations. Jan graduated from North Carolina Wesleyan in 2004 with a B.S. in Business Administration and graduated *Magna cum Laude*.

Year of birth 1981.

## **Item 3 Disciplinary Information**

Jan P. Robillard has no reportable disciplinary or regulatory events to disclose.

## **Item 4 Other Business Activities**

Jan P. Robillard has no other business affiliations or activities to report and devotes all his business efforts to JAM.

## **Item 5 Additional Compensation**

Jan P. Robillard receives no reportable additional compensation.

## **Item 6 Supervision**

Jan P. Robillard is supervised by Frank G. Jolley, President and CIO of Jolley Asset Management, LLC. This supervision includes the investment advice that is provided to clients. Frank can be reached by calling (252)451-1450 ext. 1.

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This brochure supplement provides information about Stephen F. Bishop that supplements the Jolley Asset Management, LLC Firm Brochure. You should have received a copy of that brochure. Please contact Terry Sapp, Chief Compliance Officer, if you did not receive Jolley Asset Management, LLC's Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Stephen F. Bishop is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 Educational Background and Business Experience**

Stephen has been employed in the investment and operations industry since 2008. Prior to joining Jolley Asset Management, LLC, he worked as an independent analyst with a single-family investment office in Richmond, Virginia. At the family office, Stephen performed due diligence on new global investment opportunities in private equity, hedge funds, and equities. Prior to the family office, he spent five years working in financial reporting at The Nottingham Company in Rocky Mount, North Carolina. Stephen graduated from North Carolina State University in 2006 with a B.S. in Business Management.

Year of birth 1983.

## **Item 3 Disciplinary Information**

Stephen F. Bishop has no reportable disciplinary or regulatory events to disclose.

## **Item 4 Other Business Activities**

Stephen F. Bishop has no other business affiliations or activities to report and devotes all his business efforts to JAM.

## **Item 5 Additional Compensation**

Stephen F. Bishop receives no reportable additional compensation.

## **Item 6 Supervision**

Stephen F. Bishop is supervised by Frank G. Jolley, President and CIO of Jolley Asset Management, LLC. This supervision includes the investment advice that is provided to clients. Frank can be reached by calling (252)451-1450 ext. 1.