

Brochure

Form ADV Part 2A

Item 1 - Cover Page



Main Office

359 S. Pine Street
Spartanburg, South Carolina 29302

101 East Washington Street Suite 200 Greenville, South Carolina 29601	6 Calendar Court Suite 1 Columbia, South Carolina 29206	578 East Bay Street Suite B Charleston, South Carolina 29403
---	--	---

Telephone: (864) 582-3356
Web Address: www.colonialtrust.com

May 4, 2021

This Brochure provides information about the qualifications and business practices of Colonial Trust Advisors, Inc. If you have any questions about the contents of this Brochure, please contact us at (864) 582-3356 or bbarre@colonialtrust.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Colonial Trust Advisors, Inc. is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Colonial Trust Advisors, Inc. also is available on the SEC's website at 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 110257.

Item 2 – Material Changes

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any material changes to our policies, practices, or conflicts of interest made since our last required "annual update" filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on March 4, 2021. Of course the complete Brochure is available to you at any time upon request.

Item 3 - Table of Contents

Page

Item 1 - Cover Page	1
Item 2 – Material Changes.....	1
Item 3 - Table of Contents	2
Item 4 – Advisory Business	3
Item 5 – Fees and Compensation	7
Item 6 – Performance-Based Fees and Side-By-Side Management	8
Item 7 – Types of Clients.....	9
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	9
Item 9 – Disciplinary Information	11
Item 10 – Other Financial Industry Activities and Affiliations	11
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12 – Brokerage Practices	12
Item 13 – Review of Accounts	15
Item 14 – Client Referrals and Other Compensation	15
Item 15 – Custody.....	15
Item 16 – Investment Discretion.....	16
Item 17 – Voting Client Securities.....	16
Item 18 – Financial Information.....	17
Brochure Supplements.....	Exhibit A

Item 4 – Advisory Business

Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) is an investment adviser registered with the US Securities and Exchange Commission, with our principal place of business located in South Carolina. Colonial Trust Advisors, Inc. began conducting business in 1996.

Our firm's sole principal owner is Colonial Group, Inc. Henry Walter Barre, II, Chief Operating Officer of the adviser and Barry Dean Wynn, President of the adviser, each own 25% or more of our firm. Please see Brochure Supplements, Exhibit A, for more information on these and other owners of the Holding Company, as well as other individuals who formulate investment advice and have direct contact with clients

Colonial Trust Advisors, Inc. offers the following advisory services to our clients:

INDIVIDUAL PORTFOLIO MANAGEMENT

Our firm provides asset management of client funds based on your individual needs. Through personal discussions, in which goals and objectives based on your particular circumstances are established, we develop your personal investment policy.

We create and manage a portfolio based on that policy. During our data-gathering process, we determine your individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we may also review and discuss your prior investment history, as well as family composition and background.

To implement your Investment Plan, we will manage your investment portfolio on a discretionary or a non-discretionary basis. As a discretionary investment adviser, we will have the authority to supervise and direct your portfolio without your prior consultation. Under a non-discretionary arrangement, you must be contacted prior to the execution of any trade in the account(s) under management. This may result in a delay in executing recommended trades, which could adversely affect the performance of your portfolio. This delay also normally means the affected account(s) will not be able to participate in block trades, a practice designed to enhance the execution quality, timing and/or cost for all accounts included in the block. In a non-discretionary arrangement, you retain the responsibility for the final decision on all actions taken with respect to your portfolio.

Notwithstanding the foregoing, you may impose certain written restrictions on us in the management of your investment portfolio, such as prohibiting the inclusion of certain types of investments in your investment portfolio or prohibiting the sale of certain investments held in your account at the commencement of our relationship. You should note, however, that restrictions imposed by you may adversely affect the composition and performance of your investment portfolio. You should also note that your investment portfolio is treated individually by giving consideration to each purchase or sale for your account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of our firm.

Once your portfolio has been established, we review your portfolio at least quarterly, and if necessary, rebalance your portfolio at least on an annual basis, based on your individual needs.

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, without limitation:

- Exchange-listed securities
- Foreign issuers
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- Mutual fund shares
- United States governmental securities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests

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

FINANCIAL PLANNING

One of the services offered by Colonial Trust Advisors, Inc., is financial planning, described below. This service may be provided as a stand-alone service, or may be coupled with ongoing portfolio management. Financial planning is an evaluation of your current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, relevant questions, information and analysis are considered as they impact and are impacted by the investment policy developed for you.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family financial information and goals.
- **TAX & CASH FLOW:** We consider your income tax and spending and planning for past, current and future years.
- **INVESTMENTS:** We review various asset allocations and their effect on your portfolio.
- **RETIREMENT:** We analyze current strategies and investment plans to help you achieve your retirement goals.
- **ESTATE:** We assist you in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, and asset protection plans.

We gather required information through personal interviews. Information gathered includes your current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by you and prepare a written report.

Once financial planning advice is given, you may choose to have us implement your financial plan and manage your investment portfolio on an ongoing basis. However, you are under no obligation to act upon any of the recommendations made by us under a financial planning engagement and/or to engage the services of any recommended professional.

RETIREMENT PLAN ADVISORY SERVICES

Establishing a sound fiduciary governance process is vital to good decision-making and to ensuring that prudent procedural steps are followed in making investment decisions. Colonial Trust Advisors, Inc., will provide Retirement Plan consulting services to Plans and Plan Fiduciaries as described below. The particular services provided will be detailed in the consulting agreement. The appropriate Plan Fiduciary(ies) designated in the Plan documents (e.g., the Plan sponsor or named fiduciary) will (i) make the decision to retain our firm; (ii) agree to the scope of the services that we will provide; and (iii) make the ultimate decision as to accepting any of the recommendations that we may provide. The Plan Fiduciaries are free to seek independent advice about the appropriateness of any recommended services for the Plan. Retirement Plan consulting services may be offered individually or as part of a comprehensive suite of services.

The Employee Retirement Income Security Act of 1974 ("ERISA") sets forth rules under which Plan Fiduciaries may retain investment advisers for various types of services with respect to Plan assets. For certain services, Colonial Trust Advisors, Inc., will be considered a fiduciary under ERISA. For example, Colonial Trust Advisors, Inc., will act as an ERISA § 3(21) fiduciary when providing non-discretionary investment advice to the Plan Fiduciaries by recommending a suite of investments as choices among which Plan Participants may select. Also, to the extent that the Plan Fiduciaries retain us to act as an investment manager within the meaning of ERISA § 3(38), we will provide discretionary investment management services to the Plan. With respect to any account for which we meet the definition of a fiduciary under Department of Labor rules, we acknowledge that both Colonial Trust Advisors, Inc. and our Related Persons are acting as fiduciaries. Additional disclosure may be found elsewhere in this Brochure or in the written agreement between Colonial Trust Advisors, Inc. and you.

Fiduciary Consulting Services

- *Investment Selection Services*
We will provide Plan Fiduciaries with recommendations of investment options consistent with ERISA section 404(c). Plan Fiduciaries retain responsibility for the final determination of investment options and for compliance with ERISA section 404(c).
- *Non-Discretionary Investment Advice*
We provide Plan Fiduciaries and Plan Participants general, non-discretionary investment advice regarding asset classes and investments.
- *Investment Monitoring*
We will assist in monitoring the plan's 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 we will make recommendations to maintain or remove and replace investment options. The details of this aspect of service will be enumerated in the engagement agreement between the parties.

Fiduciary Management Services

- *Discretionary Management Services*

When retained as an investment manager within the meaning of ERISA § 3(38), we provide continuous and ongoing supervision over the designated retirement plan assets. We will actively monitor the designated retirement plan assets and provide ongoing management of the assets. When applicable, we will have discretionary authority to make all decisions to buy, sell or hold securities, cash or other investments for the designated retirement plan assets in our sole discretion without first consulting with the Plan Fiduciaries. We also have 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 Plan for our management of the designated retirement plan assets.

- *Discretionary Investment Selection Services*

We will monitor the investment options of the Plan and add or remove investment options for the Plan without prior consultation with the Plan Fiduciaries. We will have discretionary authority to make and implement all decisions regarding the investment options that are available to Plan Participants.

- *Investment Management via Model Portfolios*

We will provide discretionary management of Model Portfolios among which the participants may choose to invest as Plan options. Plan Participants will also have the option of investing only in options that do not include Model Portfolios (i.e., the Plan Participants may elect to invest in one or more of the mutual fund options made available in the Plan, and choose not to invest in the Model Portfolios at all).

Non-Fiduciary Services

- *Participant Education*

We will provide education services to Plan Participants about general investment principles and the investment alternatives available under the Plan. Education presentations will not take into account the individual circumstances of each Plan Participant and individual recommendations will not be provided unless a Plan Participant separately engages us for such services. Plan Participants are responsible for implementing transactions in their own accounts.

- *Participant Enrollment*

We will assist with group enrollment meetings designed to increase retirement Plan participation among employees and investment and financial understanding by the employees.

AMOUNT OF MANAGED ASSETS

As of December 31, 2020 we were actively managing \$1,023,821,200 of clients' assets on a discretionary basis and \$77,839,427 of clients' assets on a non-discretionary basis.

Item 5 – Fees and Compensation

PORTFOLIO MANAGEMENT SERVICES FEES

The annual fee for Portfolio Management Services is charged quarterly in advance, and calculated as a percentage of assets under management, according to the following schedule:

Assets Under Management Annual Fee

First \$500,000	1.00%
Next \$500,000	0.75%
Next \$1 million	0.60%
Next \$2 million	0.50%
Next \$3 million	0.375%
Next \$3 million	0.25%
Balance above \$10 million	0.20%

On occasion, Colonial Trust Advisors, Inc. will agree to a fixed fee. Overall factors considered will include the type and amount of assets to be managed and the complexity of the client's circumstances. The minimum annual fixed fee is \$1,000.

Limited Negotiability of Advisory Fees: Although Colonial Trust Advisors, Inc. has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

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

FINANCIAL PLANNING FEES

When we provide financial planning services to clients, our fees typically range from \$1,500 to \$5,000 depending on the scope of the engagement. These fees are negotiated and agreed to at the time of the engagement for such services.

GENERAL INFORMATION

Termination of the Advisory Relationship: A client agreement may be canceled at any time, by either party, for any reason. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded.

In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

Mutual Fund Fees: All fees paid to Colonial Trust Advisors, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds ("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. If the fund also imposes sales charges, you may pay an initial or deferred sales charge. You could invest in a mutual fund directly, without our services. In that case, you would not receive the services provided by our firm which are designed, among other things, to assist you in determining which mutual fund or funds are most appropriate to your financial condition and objectives. Accordingly, you should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by you and to thereby evaluate the advisory services being provided.

In a limited number of situations when it benefits you in terms of the lowest overall fee structure available, on certain assets in a portfolio Colonial Trust Company, an affiliate of Colonial Trust Advisors, Inc., may receive a portion of the mutual fund expenses in lieu of Colonial Trust Advisors, Inc. receiving an advisory fee. Unless specified in the written agreement signed by you, you will not pay Colonial Trust Advisors, Inc. an advisory fee on any assets for which Colonial Trust Company receives any portion of a mutual fund's fee.

Additional Fees and Expenses: In addition to our advisory fees, you are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for your account(s). Please refer to the ***Item 12 - Brokerage Practices*** for additional information.

Grandfathering of Minimum Account Requirements: Pre-existing advisory clients are subject to our minimum account requirements and advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. 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.

Other Compensation: Certain individuals at Colonial Trust Advisors are licensed to sell insurance in South Carolina and is entitled to receive commissions or other remuneration on the sale of insurance products. As such, these individuals are able to effect insurance transactions and will receive separate, yet customary compensation. To protect your interests, Colonial Trust Advisors, Inc.'s policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will you pay both an insurance commission and a management fee to Colonial Trust Advisors, Inc. on the same pool of assets.

Item 6 – Performance-Based Fees and Side-By-Side Management

We do not have any performance-based fee arrangements. "Side-by-Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a

performance fee basis. Because our firm has no performance-based fee accounts, we have no side-by-side management.

Item 7 – Types of Clients

Colonial Trust Advisors, Inc. serves individuals, high net worth individuals, pension and profit-sharing plans, charitable organizations and corporations. We do not impose a minimum portfolio value. The minimum annual fixed fee is \$1,000.

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

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing your assets

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Qualitative Analysis. We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, and predict changes to share price based on that data.

A risk of using qualitative analysis is that our subjective judgment may prove incorrect.

Asset Allocation. Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to your investment goals and risk tolerance.

A risk of asset allocation is that you may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in your portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by you may purchase the same security, increasing the risk to you if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for your portfolio.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategy(ies) in managing your account, provided that such strategy(ies) are appropriate to your needs and consistent with your investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them in your account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to you. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell. While we employ a long-term strategy, we constantly evaluate the merits of both our investments and our holding periods. Our view on both is subject to change with company specific, economic, and/or market circumstances.

Short-term purchases. When utilizing this strategy on occasion, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A short-term purchase strategy poses risks should the anticipated price swing not materialize; we are then left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss. In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Item 9 – Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to your evaluation of our advisory business or the integrity of our management. Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

As a subsidiary of Colonial Group, Inc., our firm is under common ownership and control with the Colonial Trust Company (the “Trust Company”), a state chartered trust company that offers a broad spectrum of fiduciary and financial services to individual and corporate clients. The services provided by the Trust Company are separate and distinct from our advisory services, and are provided for separate and additional compensation.

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.

Colonial Trust Advisors, Inc. 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 of Ethics.

Our Code of Ethics includes policies and procedures for the 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) or an initial public offering. Our Code of Ethics also provides for oversight, enforcement and recordkeeping provisions.

Our Code of Ethics also includes the firm's policy prohibiting the use of material non-public 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 in a 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 sent to bbarre@colonialgroup.com, or by calling us at 864-582-5825.

Our Code of Ethics is designed to ensure 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.

We may aggregate our employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, we have established policies and procedures for implementing our firm's Code of Ethics, to help ensure that our firm complies with our regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest.

Item 12 – Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, we seek "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, we may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of our clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Colonial Trust Advisors, Inc. has an arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides our firm with their "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like Colonial Trust Advisors, Inc. in conducting business and in serving the best interests of our clients but that may also benefit us. The benefits of participation in the platform are offered to all participants of the platform, and are not soft dollars

For our clients' accounts that Fidelity maintains, Fidelity 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 Fidelity account. Certain trades may not incur Fidelity commissions or transaction fees. Fidelity is also compensated by earning interest on the uninvested cash in your account. Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables Colonial Trust Advisors, Inc. to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers. As part of the arrangement, Fidelity also makes available to our firm, at no additional charge to us, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by Colonial Trust

Advisors, Inc. (within specified parameters). These research and brokerage services presently include services such as its Wealth Central Platform with trading tools and research, including, but not limited to Bond Trader Pro, Standard & Poor's, Argus, Decision Economics, Zach's Market Grader and Morningstar, and are used by our firm to manage accounts for which we have investment discretion.

Colonial Trust Advisors, Inc. also receives additional services which may include discounted business consulting services. Without this arrangement, we might be compelled to purchase the same or similar services at our own expense.

As a result of receiving such services for no additional cost, we have an incentive to continue to use or expand the use of Fidelity's services. We examined this potential conflict of interest when we chose to enter into the relationship with Fidelity and have determined that the relationship is in the best interests of our clients and satisfies our client obligations, including our duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, while we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by us will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account. Colonial Trust Advisors, Inc. and Fidelity are not affiliated.

Aggregated Trades

We may enter trades as a block where possible and when advantageous to clients whose accounts have a need to buy or sell shares of the same security. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rata basis between all accounts included in any such block. Block trading allows us to execute equity trades in a timelier, equitable manner, and may reduce overall costs to you.

We will only aggregate transactions when we believe that aggregation is consistent with our duty to seek best execution (which includes the duty to seek best price) for our clients, and is consistent with the terms of our Investment Advisory Agreement with each client for which trades are being aggregated. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all of our clients' transactions in a given security on a given business day, with transaction costs generally shared pro-rata based on each client's participation in the transaction. On occasion, owing to the size of a particular account's pro rata share of an order or other factors, the commission or transaction fee charged could be above or below a breakpoint in a pre-determined commission or fee schedule set by the executing broker, and therefore transaction charges may vary slightly among accounts. Accounts may be excluded from a block due to tax considerations, client direction or other factors making the account's participation ineligible or impractical.

We will prepare, before entering an aggregated order, a written statement ("Allocation Statement") specifying the participating client accounts and how it intends to allocate the order among those

clients. If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement. If the order is partially filled, it will generally be allocated pro-rata, based on the Allocation Statement, or randomly in certain circumstances. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment, and the reason for different allocation is explained in writing and is approved by an appropriate individual/officer of our firm. Our books and records will separately reflect, for each client account included in a block trade, the securities held by and bought and sold for that account. Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the transaction on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement, and we will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation.

Directed Brokerage

You may direct Colonial Trust Advisors, Inc. to use a particular broker for custodial and/or transaction services on behalf of your portfolio. In directed brokerage arrangements, you are responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangement that we have with Fidelity is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, you acknowledge that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing Colonial Trust Advisors, Inc. to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Colonial Trust Advisors, Inc. that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

Cross Trades

From time to time, we may direct a "cross trade" of securities (including, without limitation, fixed income securities) between client accounts, whereby Colonial Trust Advisors, Inc. arranges for one client account to purchase a security directly from another client. In such cases, we will seek to obtain a price for the security from one or more independent sources. Colonial Trust Advisors, Inc. is not a broker-dealer and receives no compensation from a cross trade; however, the broker-dealer facilitating the cross trade normally charges administrative fees to the clients' accounts.

We may direct a cross trade when we believe that the transaction is in the best interest of the clients, that no client will be disfavored by the transaction, and that the transaction is consistent with our duty to seek best execution.

Item 13 – Review of Accounts

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of your stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as your individual circumstances (marriage, divorce, retirement); or the market, political or economic environment.

These accounts are reviewed by:

Barry D. Wynn, President
H. Walter Barre II, Chief Operating Officer
Camp R. Wynn, CFA, Executive Vice President
Bert D. Barre, CFA, CTFA, Executive Vice President
W. Charlton Wieters, Financial Advisor
Bradley K. Humphries, Financial Advisor

REPORTS: In addition to the monthly statements and confirmations of transactions that Portfolio Management Services clients receive from their account custodian, Colonial Trust Advisors, Inc. will provide quarterly reports summarizing account performance, balances and holdings. We urge you to compare the reports that we provide to the reports received from the account custodian, and notify us at once if there is any discrepancy. At times there may be small differences due to the timing of dividend reporting, pending trades or other similar issues.

For stand-alone Financial Planning clients, there are no ongoing reports provided by Colonial Trust Advisors, Inc., aside from the initial financial planning report.

Item 14 – Client Referrals and Other Compensation

As noted above, we receive an economic benefit from Fidelity in the form of support products and services it makes available to us and other independent investment advisors whose clients maintain accounts at Fidelity. These products and services, how they benefit our firm, and the related conflicts of interest are described in **Item 12 - Brokerage Practices**. The availability of Fidelity's products and services to Colonial Trust Advisors, Inc. is based solely on our participation in the programs and not on the provision of any particular investment advice. Neither Fidelity nor any other party is paid to refer clients to Colonial Trust Advisors, Inc.

Item 15 – Custody

It is the responsibility of the account custodian to provide you with confirmations of trading activity, tax forms and at least quarterly account statements. You are advised to review this information carefully, and to notify us of any questions or concerns. You are also asked to promptly notify us if the custodian fails to provide statements on each account held.

We previously disclosed in **Item 5 – Fees and Compensation** of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, your custodian is advised of the amount of the fee to be deducted from your account. On at least a quarterly basis, the custodian is required to send to you a statement showing all transactions 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 you to carefully review your custodial statements to verify the accuracy of the calculation, among other things. You should contact us directly if you believe that there may be an error in your statement.

Item 16 – Investment Discretion

As described in **Item 4 - Advisory Business**, we will accept clients on either a discretionary or non-discretionary basis. For *discretionary accounts*, a Limited Power of Attorney (“LPOA”) is executed by you, giving us the authority to carry out various activities in your account, generally including the following: trade execution; the ability to request checks on your behalf; and, the withdrawal of advisory fees directly from your account. We then direct investment of your portfolio using our discretionary authority. You may limit the terms of the LPOA to the extent consistent with your investment advisory agreement with us and the requirements of your custodian.

For *non-discretionary* accounts, you also generally execute an LPOA, which allows us to carry out trade recommendations and approved actions in your portfolio. However, in accordance with the investment advisory agreement between us, we do not implement trading recommendations or other actions in your account unless and until you have approved the recommendation or action. As with discretionary accounts, you may limit the terms of the LPOA, subject to our agreement with you and the requirements of your custodian.

Item 17 – Voting Client Securities

In accordance with our client agreement 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 not to 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 books and 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 we voted proxies. If our firm has a conflict of interest in voting a particular action, we will notify you of the conflict and retain an independent third-party to cast a vote.

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

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

With respect to ERISA accounts, we will vote proxies unless the plan documents specifically reserve the plan sponsor's right to vote proxies. To direct us to vote a proxy in a particular manner, clients should contact Bert D. Barre by telephone, email, or in writing.

You can instruct us to vote proxies according to particular criteria (for example, to always vote with management, or to vote for or against a proposal to allow a so-called "poison pill" defense against a possible takeover). These requests must be made in writing. You can also instruct us on how to cast your vote in a particular proxy contest by contacting us at (864) 582-3356.

Item 18 – Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Colonial Trust Advisors, Inc. has no additional financial circumstances to report.

Exhibit A

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Barry D. Wynn

CRD# 473736

of



359 S. Pine Street
Spartanburg, South Carolina 29302

(864) 582-3356

www.colonialtrust.com

May 4, 2021

This Brochure Supplement provides information about Barry Wynn, and supplements the Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) Brochure. You should have received a copy of that Brochure. Please contact us at (864) 582-3356 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 - Educational Background and Business Experience

Barry D. Wynn (year of birth 1945) is President of Colonial Trust Advisors, Inc. Prior to co-founding Colonial Trust Advisors, Inc. in 1996 with Walter Barre, Barry joined Colonial Trust Company in 1992, where he currently serves as President. Previously, Barry served as a Financial Consultant with The Robinson-Humphrey Company (1981-1992), Vice President of Frost, Johnson, Reid & Smith, Inc. (1973-1981), Registered Representative of Shearson Lehman Brothers (1971-1973), and a Broker with The Robinson-Humphrey Company (1968-1970).

Barry earned a BS in Business Administration from The Citadel in 1967.

Item 3 – Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Barry has no such disciplinary information to report.

Item 4 – Other Business Activities

Barry is also employed by Colonial Trust Company. Both Colonial Trust Advisors, Inc. and Colonial Trust Company are wholly owned subsidiaries of Colonial Group, Inc. Colonial Trust Company is registered with and regulated by the South Carolina Board of Financial Institutions and provides professional fiduciary services including personal trust and estate- related services.

Barry holds the title of President of Colonial Trust Company and is involved in the investment management, fiduciary decision making, administrative oversight, and compliance of the firm's business. Approximately 25% of his time is spent on the business of Colonial Trust Company with the remaining 75% being spent on Colonial Trust Advisors, Inc. business.

Colonial Trust Company's business activity includes, but is not limited to, investment management of fiduciary accounts. The investment management portion of his responsibilities at Colonial Trust Company is very similar to those with Colonial Trust Advisors, Inc. Relationships or entities requiring the degree of fiduciary supervision consistent with the role of a corporate trustee, estate settlement, or escrow agent are handled entirely by Colonial Trust Company. To the contrary, relationships requiring traditional investment management services only are administered entirely by Colonial Trust Advisors, Inc. As such there is no overlap of service offerings, limiting any conflicts of interest between the two firms. Colonial Trust Company and Colonial Trust Advisors, Inc. do refer business to each other based on the type of service needed. The separation of responsibilities and differing regulatory structure of the two firms are clearly disclosed to each client and prospective client.

For his role with Colonial Trust Company, Barry is paid a salary and has bonus potential based on the firm's total book of business, not related to any relationship or business activity quota. No other compensation is earned for the sale of securities or other investment products.

Item 5 – Additional Compensation

Except as stated above, Barry has no other income or compensation to disclose.

Item 6 – Supervision

As President of Colonial Trust Advisors, Inc., Barry, along with H. Walter Barre II, Chief Operating Officer of Colonial Trust Advisors, Inc., supervises all duties and activities of the firm. Their contact information is on the cover page of this disclosure document.

Colonial Trust Advisors, Inc. provides investment management services through a team based approach. Though a client may have one particular relationship manager, the firm's investment committee is collectively responsible for reviewing the criteria of securities, including specific individual equity securities, ETFs and mutual funds that are the focus of the firm's investment strategy.

The investment committee reviews portfolio investment performance across accounts regardless of the assigned portfolio manager. Colonial Trust Advisors, Inc. also utilizes portfolio management and trade order management software to track portfolio objectives, appropriate asset allocations, and enforce client limitations and trade restrictions.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

H. Walter Barre, II

CRD# 830712

of



359 S. Pine Street
Spartanburg, South Carolina 29302

(864) 582-3356

www.colonialtrust.com

May 4, 2021

This Brochure Supplement provides information about Walter Barre, and supplements the Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) Brochure. You should have received a copy of that Brochure. Please contact us at (864) 582-3356 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 - Educational Background and Business Experience

H. Walter Barre, II (year of birth 1948) is Chief Operating Officer of Colonial Trust Advisors, Inc., which he co-founded with Barry Wynn in 1996. He had joined Colonial Trust Company in 1989 and still serves as its Chairman. Previously, Walter served as a Financial Consultant with The Robinson-Humphrey Company (1981-1989), a Financial Planner with Frost, Johnson, Reid & Smith, Inc. (1977-1981), and President of Black Investments (1972-1977).

Walter earned a BS in Business Administration and Accounting from Washington and Lee University in 1970, and his MBA in Finance in 1972.

Item 3 – Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Walter has no such disciplinary information to report.

Item 4 – Other Business Activities

Walter is also employed by Colonial Trust Company. Both Colonial Trust Advisors, Inc. and Colonial Trust Company are wholly owned subsidiaries of Colonial Group, Inc. Colonial Trust Company is registered with and regulated by the South Carolina Board of Financial Institutions and provides professional fiduciary services including personal trust and estate related services.

Walter holds the title of Chairman of Colonial Trust Company and is involved in the investment management, fiduciary decision making, administrative oversight, and compliance of the firm's business. Approximately 35% of his time is spent on the business of Colonial Trust Company with the remaining 65% being spent on Colonial Trust Advisors, Inc. business.

Colonial Trust Company's business activity includes, but is not limited to, investment management of fiduciary accounts. The investment management portion of his responsibilities at Colonial Trust Company is very similar to those with Colonial Trust Advisors, Inc. Relationships or entities requiring the degree of fiduciary supervision consistent with the role of a corporate trustee, estate settlement, or escrow agent are handled entirely by Colonial Trust Company. To the contrary, relationships requiring traditional investment management services only are administered entirely by Colonial Trust Advisors, Inc. As such there is no overlap of service offerings limiting any conflicts of interest between the two firms. Colonial Trust Company and Colonial Trust Advisors, Inc. do refer business to each other based on the type of service needed. The separation of responsibilities and differing regulatory structure of the two firms are clearly disclosed to each client and prospective client.

For his role with Colonial Trust Company, Walter is paid a salary and has bonus potential based on the firm's total book of business, not related to any relationship or business activity quota. No other compensation is earned for the sale of securities or other investment products.

Item 5 – Additional Compensation

Except as stated above, Walter has no other income or compensation to disclose.

Item 6 – Supervision

As Chief Operating Officer of Colonial Trust Advisors, Inc., Walter, along with Barry D. Wynn, President of Colonial Trust Advisors, Inc., supervises all duties and activities of the firm. Their contact information is on the cover page of this disclosure document.

Colonial Trust Advisors, Inc. provides investment management services through a team based approach. Though a client may have one particular relationship manager, the firm's investment committee is collectively responsible for reviewing the criteria of securities, including specific individual equity securities, ETFs and mutual funds that are the focus of the firm's investment strategy.

The investment committee reviews portfolio investment performance across accounts regardless of the assigned portfolio manager. Colonial Trust Advisors, Inc. also utilizes portfolio management and trade order management software to track portfolio objectives, appropriate asset allocations, and enforce client limitations and trade restrictions.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Camp R. Wynn, CFA

CRD# 3118195

101 E. Washington St.
Suite 200
Greenville, South Carolina 29602
(864) 370-0737

of



359 S. Pine Street
Spartanburg, South Carolina 29302

(864) 582-3356

www.colonialtrust.com

May 4, 2021

This Brochure Supplement provides information about Camp Wynn, and supplements the Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) Brochure. You should have received a copy of that Brochure. Please contact us at (864) 582-3356 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 – Educational Background and Business Experience

Camp R. Wynn (year of birth 1974) joined Colonial Trust Advisors, Inc. in 2001 and is an Executive Vice President. Camp simultaneously joined Colonial Trust Company in 2001, where he currently serves as Executive Vice President and Trust Officer. Previously, Camp served as an Associate with Bank of America

(2000-2001) and an Analyst with Banc of America Securities (1998-1999). Camp earned a BS in Finance from the University of South Carolina in 1997, and his Chartered Financial Analyst® designation* in 2003.

* The Chartered Financial Analyst® (“CFA®”) designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charterholder, he/she must meet minimum experience requirements in the area of investment/financial practice. To enroll in the program, a candidate must hold a bachelor’s degree.

Item 3 – Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Camp has no such disciplinary information to report.

Item 4 – Other Business Activities

Camp is also employed by Colonial Trust Company. Both Colonial Trust Advisors, Inc. and Colonial Trust Company are wholly owned subsidiaries of Colonial Group, Inc. Colonial Trust Company is registered with and regulated by the South Carolina Board of Financial Institutions and provides professional fiduciary services including personal trust and estate related services.

Camp holds the title of Executive Vice President and Trust Officer of Colonial Trust Company and is involved in the investment management, fiduciary decision making, administrative oversight, and compliance of the firm's business. Approximately 35% of his time is spent on the business of Colonial Trust Company with the remaining 65% being spent on Colonial Trust Advisors, Inc. business.

Colonial Trust Company's business activity includes, but is not limited to, investment management of fiduciary accounts. The investment management portion of his responsibilities at Colonial Trust Company is very similar to those with Colonial Trust Advisors, Inc. Relationships or entities requiring the degree of fiduciary supervision consistent with the role of a corporate trustee, estate settlement, or escrow agent are handled entirely by Colonial Trust Company. To the contrary, relationships requiring traditional investment management services only are administered entirely by Colonial Trust Advisors, Inc. As such there is no overlap of service offerings limiting any conflicts of interest between the two firms. Colonial Trust Company and Colonial Trust Advisors, Inc. do refer business to each other based on the type of service needed. The separation of responsibilities and differing regulatory structure of the two firms are clearly disclosed to each client and prospective client.

For his role with Colonial Trust Company, Camp is paid a salary and has bonus potential based on the firm's total book of business, not related to any relationship or business activity quota. No other compensation is earned for the sale of securities or other investment products.

Item 5 – Additional Compensation

Except as stated above, Camp has no other income or compensation to disclose.

Item 6 – Supervision

H. Walter Barre II, Chief Operating Officer of Colonial Trust Advisors, Inc., and Barry D. Wynn, President of Colonial Trust Advisors, Inc., supervise all duties and activities of the firm. Their contact information is on the cover page of this disclosure document.

Colonial Trust Advisors, Inc. provides investment management services through a team based approach. Though a client may have one particular relationship manager, the firm's investment committee is collectively responsible for reviewing the criteria of securities, including specific individual equity securities, ETFs and mutual funds that are the focus of the firm's investment strategy.

The investment committee reviews portfolio investment performance across accounts regardless of the assigned portfolio manager. Colonial Trust Advisors, Inc. also utilizes portfolio management and trade order management software to track portfolio objectives, appropriate asset allocations, and enforce client limitations and trade restrictions.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Bert D. Barre, CFA

CRD# 4119994

of



359 S. Pine Street
Spartanburg, South Carolina 29302

(864) 582-3356

www.colonialtrust.com

May 4, 2021

This Brochure Supplement provides information about Bert Barre, and supplements the Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) Brochure. You should have received a copy of that Brochure. Please contact us at (864) 582-3356 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 – Educational Background and Business Experience

Bert D. Barre (year of birth 1977) joined Colonial Trust Advisors, Inc. in 2001 and is an Executive Vice President. Bert simultaneously joined Colonial Trust Company in 2001, where he currently serves as Executive Vice President and Trust Officer. Previously, Bert served as an Assistant Equity Analyst with Wachovia Securities, Inc. from 1999 to 2001.

Bert earned a BS in Business Administration and Accounting from Washington and Lee University in 1999. In addition, he received the Chartered Financial Analyst® designation* in 2003.

* The Chartered Financial Analyst® (“CFA®”) designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-

study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charterholder, he/she must meet minimum experience requirements in the area of investment/financial practice. To enroll in the program, a candidate must hold a bachelor's degree.

Item 3 – Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Bert has no such disciplinary information to report.

Item 4 – Other Business Activities

Bert is also employed by Colonial Trust Company. Both Colonial Trust Advisors, Inc. and Colonial Trust Company are wholly owned subsidiaries of Colonial Group, Inc. Colonial Trust Company is registered with and regulated by the South Carolina Board of Financial Institutions and provides professional fiduciary services including personal trust and estate related services.

Bert holds the title of Executive Vice President and Trust Officer of Colonial Trust Company and is involved in the investment management, fiduciary decision making, administrative oversight, and compliance of the firm's business. Approximately 65% of his time is spent on the business of Colonial Trust Company with the remaining 35% being spent on Colonial Trust Advisors, Inc. business.

Colonial Trust Company's business activity includes, but is not limited to, investment management of fiduciary accounts. The investment management portion of his responsibilities at Colonial Trust Company is very similar to those with Colonial Trust Advisors, Inc. Relationships or entities requiring the degree of fiduciary supervision consistent with the role of a corporate trustee, estate settlement, or escrow agent are handled entirely by Colonial Trust Company. To the contrary, relationships requiring traditional investment management services only are administered entirely by Colonial Trust Advisors, Inc. As such there is no overlap of service offerings limiting any conflicts of interest between the two firms. Colonial Trust Company and Colonial Trust Advisors, Inc. do refer business to each other based on the type of service needed. The separation of responsibilities and differing regulatory structure of the two firms are clearly disclosed to each client and prospective client.

For his role with Colonial Trust Company, Bert is paid a salary and has bonus potential based on the firm's total book of business, not related to any relationship or business activity quota. No other compensation is earned for the sale of securities or other investment products.

Item 5 – Additional Compensation

Except as stated above, Bert has no other income or compensation to disclose.

Item 6 – Supervision

Barry D. Wynn, President of Colonial Trust Advisors, Inc., and H. Walter Barre II, Chief Operating Officer of Colonial Trust Advisors, Inc., supervise all duties and activities of the firm. Their contact information is on the cover page of this disclosure document.

Colonial Trust Advisors, Inc. provides investment management services through a team based approach. Though a client may have one particular relationship manager, the firm's investment committee is collectively responsible for reviewing the criteria of securities, including specific individual equity securities, ETFs and mutual funds that are the focus of the firm's investment strategy.

The investment committee reviews portfolio investment performance across accounts regardless of the assigned portfolio manager. Colonial Trust Advisors, Inc. also utilizes portfolio management and trade order management software to track portfolio objectives, appropriate asset allocations, and enforce client limitations and trade restrictions.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Bradley K. Humphries, CFP®, CLU®

CRD# 6184803

6 Calendar Court

Suite 1

Columbia, South Carolina 29206

(803) 782-7646

of



359 S. Pine Street

Spartanburg, South Carolina 29302

(864) 582-3356

www.colonialtrust.com

May 4, 2021

This Brochure Supplement provides information about Brad Humphries, and supplements the Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) Brochure. You should have received a copy of that Brochure. Please contact us at (864) 582-3356 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 - Educational Background and Business Experience

Bradley K. Humphries (year of birth 1983) joined Colonial Trust Advisors, Inc. in 2015 where he holds the title Financial Advisor, Planning & Risk Analyst. Previously, Brad served as a Financial Advisor and Registered Representative at Northwestern Mutual Investment Services, LLC (2013-2015), an Agent at Northwestern Mutual Life Insurance Company (2013-2015), a Marketing Representative and an Account Executive at Federated Mutual Insurance Company (2008-2013) and an Agent at Trumbull Services (2007-2008).

Brad earned a BA in Mathematics from Clemson University in 2006 and his Chartered Life Underwriter® designation* in 2015. Brad is a CERTIFIED FINANCIAL PLANNER™ professional**.

* The American College awards The Chartered Life Underwriter® (CLU®). The CLU® is a professional designation for individuals who wish to specialize in life insurance and estate planning. Individuals must complete five core courses and three elective courses, and successfully pass all eight two-hour, 100-question examinations in order to receive the designation. Continuing Education requirements are 30 hours every two years.

** The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Brad has no such disciplinary information to report.

Item 4 - Other Business Activities

Brad also joined Colonial Trust Company in 2015. Both Colonial Trust Advisors, Inc. and Colonial Trust Company are wholly owned subsidiaries of Colonial Group, Inc. Colonial Trust Company is registered with and regulated by the South Carolina Board of Financial Institutions and provides professional fiduciary services including personal trust and estate related services.

Brad holds the title of Financial Advisor, Planning & Risk Analyst at Colonial Trust Company and is involved in the investment management and fiduciary decision making of the firm's business. Approximately 85% of his time is spent on the business of Colonial Trust Advisors, Inc. with the remaining 15% being spent on Colonial Trust Company business.

Colonial Trust Company's business activity includes, but is not limited to, investment management of fiduciary accounts. The investment management portion of his responsibilities at Colonial Trust Company is very similar to those with Colonial Trust Advisors, Inc. Relationships or entities requiring the degree of fiduciary supervision consistent with the role of a corporate trustee, estate settlement, or escrow agent are handled entirely by Colonial Trust Company. To the contrary, relationships requiring traditional investment management services only are administered entirely by Colonial Trust Advisors, Inc. As such there is no overlap of service offerings limiting any conflicts of interest between the two firms. Colonial Trust Company and Colonial Trust Advisors, Inc. do refer business to each other based on the type of service needed. The separation of responsibilities and differing regulatory structure of the two firms are clearly disclosed to each client and prospective client.

For his role with Colonial Trust Company, Brad is paid a salary and has bonus potential based on the firm's total book of business, not related to any relationship or business activity quota. No other compensation is earned for the sale of securities or other investment products.

Brad is licensed to sell insurance in South Carolina and is entitled to receive commissions or other remuneration on the sale of insurance products. As such, Brad will be able to effect insurance transactions and

will receive separate, yet customary compensation. To protect client interests, Colonial Trust Advisors, Inc.'s policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will the client pay both a commission to Brad and a management fee to Colonial Trust Advisors, Inc. on the same pool of assets.

Item 5 - Additional Compensation

Except as stated above, Brad is not engaged in any other investment-related business or occupation, and does not earn compensation for the sale of any other products or services.

Item 6 - Supervision

Barry D. Wynn, President of Colonial Trust Advisors, Inc., and H. Walter Barre II, Chief Operating Officer of Colonial Trust Advisors, Inc., supervise all duties and activities of the firm. Their contact information is on the cover page of this disclosure document.

Colonial Trust Advisors, Inc. provides investment management services through a team based approach. Though a client may have one particular relationship manager, the firm's investment committee is collectively responsible for reviewing the criteria of securities, including specific individual equity securities, ETFs and mutual funds that are the focus of the firm's investment strategy.

The investment committee reviews portfolio investment performance across accounts regardless of the assigned portfolio manager. Colonial Trust Advisors, Inc. also utilizes portfolio management and trade order management software to track portfolio objectives, appropriate asset allocations, and enforce client limitations and trade restrictions.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

William Charlton Wieters

CRD# 4730546

578 East Bay Street
Suite B
Charleston, South Carolina 29403
(803) 782-7646

of



359 S. Pine Street
Spartanburg, South Carolina 29302

(864) 582-3356

www.colonialtrust.com

May 4, 2021

This Brochure Supplement provides information about William Charlton Wieters, and supplements the Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) Brochure. You should have received a copy of that Brochure. Please contact us at (864) 582-3356 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 - Educational Background and Business Experience

William Charlton Wieters (year of birth 1974) joined Colonial Trust Advisors in 2018 as a Financial Advisor, and is a Trust Officer of Colonial Trust Company. Previously, Charlton served as a Financial Officer at Coastal Community Foundation of South Carolina. Charlton has worked as a Staff Accountant and Finance Manager as well as Financial Advisor before joining Colonial Trust Company. Charlton earned a BA from The University of the South in Sewanee, Tennessee in 1997, and a Master's in Business Administration from The Citadel in 2002.

In 2014 Charlton completed the Common Fund Endowment Institute Investment Series at the Yale School of Management.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Charlton has no such disciplinary information to report.

Item 4 - Other Business Activities

Both Colonial Trust Advisors, Inc. and Colonial Trust Company are wholly owned subsidiaries of Colonial Group, Inc. Colonial Trust Company is registered with and regulated by the South Carolina Board of Financial Institutions and provides professional fiduciary services including personal trust and estate related services.

Charlton holds the title of Trust Officer at Colonial Trust Company and is involved in the investment management and fiduciary decision making of the firm's business. Approximately 75% of his time is spent on the business of Colonial Trust Company with the remaining 25% being spent on Colonial Trust Advisors, Inc. business.

Colonial Trust Company's business activity includes, but is not limited to, investment management of fiduciary accounts. The investment management portion of his responsibilities at Colonial Trust Company is very similar to those with Colonial Trust Advisors, Inc. Relationships or entities requiring the degree of fiduciary supervision consistent with the role of a corporate trustee, estate settlement, or escrow agent are handled entirely by Colonial Trust Company. To the contrary, relationships requiring traditional investment management services only are administered entirely by Colonial Trust Advisors, Inc. As such there is no overlap of service offerings limiting any conflicts of interest between the two firms. Colonial Trust Company and Colonial Trust Advisors, Inc. do refer business to each other based on the type of service needed. The separation of responsibilities and differing regulatory structure of the two firms are clearly disclosed to each client and prospective client.

For his role with Colonial Trust Company, Charlton is paid a salary and has bonus potential based on the firm's total book of business, not related to any relationship or business activity quota. No other compensation is earned for the sale of securities or other investment products.

Item 5 - Additional Compensation

Except as stated above, Charlton is not engaged in any other investment-related business or occupation, and does not earn compensation for the sale of any other products or services.

Item 6 - Supervision

Barry D. Wynn, President of Colonial Trust Advisors, Inc., and H. Walter Barre II, Chief Operating Officer of Colonial Trust Advisors, Inc., supervise all duties and activities of the firm. Their contact information is on the cover page of this disclosure document.

Colonial Trust Advisors, Inc. provides investment management services through a team based approach. Though a client may have one particular relationship manager, the firm's investment committee is collectively responsible for reviewing the criteria of securities, including specific individual equity securities, ETFs and mutual funds that are the focus of the firm's investment strategy.

The investment committee reviews portfolio investment performance across accounts regardless of the assigned portfolio manager. Colonial Trust Advisors, Inc. also utilizes portfolio management and trade order management software to track portfolio objectives, appropriate asset allocations, and enforce client limitations and trade restrictions.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Reid E. Thompson, AIF®

CRD# 4714755

101 E. Washington St.
Suite 200
Greenville, South Carolina 29602
(864) 370-0737

of



359 S. Pine Street
Spartanburg, South Carolina 29302

(864) 582-3356

www.colonialtrust.com

May 4, 2021

This Brochure Supplement provides information about Reid Thompson, and supplements the Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) Brochure. You should have received a copy of that Brochure. Please contact us at (864) 582-3356 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 – Educational Background and Business Experience

Reid E. Thompson (year of birth 1976) joined Colonial Trust Advisors, Inc. in 2020 and as a Vice President & Corporate Retirement Plan Specialist. Prior to joining Colonial Trust Advisors he held positions with NYLIFE Securities/Eagle Strategies as a Registered Representative and Investment Adviser Representative. From 2014 to 2017, he was a Regional Vice President with NorthStar Realty Securities. From 2009 through 2014, Reid held

various positions with Heritage Financial, King Consolidated, Inc., Select Capital Corporation and JCC Advisors. He earned a BA in Business Administration from Furman University in 1998, and is an Accredited Investment Fiduciary®*.

*The Accredited Investment Fiduciary® (AIF®) designation is conferred by fi360, an organization dedicated to investment fiduciary education, and represents a thorough knowledge of and ability to apply the fiduciary practices. Through fi360's AIF Training programs, AIF designees learn the practices and the legal and best practice framework they are built upon. AIF designees must annually accrue six hours of continuing professional education with at least four coming from fi360-produced sources; attest to a code of ethics; maintain current contact information in fi360's designee database, and remit annual dues.

Item 3 – Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Reid has no such disciplinary information to report.

Item 4 – Other Business Activities

Reid is not engaged in any other business activities.

Item 5 – Additional Compensation

Reid has no other income or compensation to disclose.

Item 6 – Supervision

H. Walter Barre II, Chief Operating Officer of Colonial Trust Advisors, Inc., and Barry D. Wynn, President of Colonial Trust Advisors, Inc., supervise all duties and activities of the firm. Their contact information is on the cover page of this disclosure document.

Colonial Trust Advisors, Inc. provides investment management services through a team based approach. Though a client may have one particular relationship manager, the firm's investment committee is collectively responsible for reviewing the criteria of securities, including specific individual equity securities, ETFs and mutual funds that are the focus of the firm's investment strategy.

The investment committee reviews portfolio investment performance across accounts regardless of the assigned portfolio manager. Colonial Trust Advisors, Inc. also utilizes portfolio management and trade order management software to track portfolio objectives, appropriate asset allocations, and enforce client limitations and trade restrictions.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

James C. Fiske, CFP®
CRD# 6851250

101 E. Washington St.
Suite 200
Greenville, South Carolina 29602
(864) 370-0737

of



359 S. Pine Street
Spartanburg, South Carolina 29302

(864) 582-3356

www.colonialtrust.com

May 4, 2021

This Brochure Supplement provides information about James ("Jimmy") Fiske, and supplements the Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) Brochure. You should have received a copy of that Brochure. Please contact us at (864) 582-3356 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 - Educational Background and Business Experience

James C. Fiske (year of birth 1986) joined Colonial Trust Advisors, Inc. in 2019 as a Portfolio Manager and Investment Analyst. Prior to joining the firm, he worked as a Financial Advisor at BB&T in Greenville, South Carolina. From 2012 to 2017, Jimmy was a Portfolio Analyst at Brown Advisory in Washington, DC. He also served in the position of fund accountant at Cardinal Bank in McLean, Virginia, from 2010 to 2012.

Jimmy earned a Bachelor's in Economics from the University of South Carolina and a Certificate in Financial Planning from Georgetown University - School of Continuing Studies. Jimmy is a CERTIFIED FINANCIAL PLANNER™ professional.

* The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

Item 3 – Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Jimmy has no such disciplinary information to report.

Item 4 – Other Business Activities

Jimmy is also employed by Colonial Trust Company. Both Colonial Trust Advisors, Inc. and Colonial Trust Company are wholly owned subsidiaries of Colonial Group, Inc. Colonial Trust Company is registered with and regulated by the South Carolina Board of Financial Institutions and provides professional fiduciary services including personal trust and estate related services.

Jimmy holds the title of Portfolio Manager and Investment Analyst at Colonial Trust Company and is involved in the investment management aspect of the firm. Approximately 40% of his time is spent on the business of Colonial Trust Company with the remaining 60% being spent on Colonial Trust Advisors, Inc. business.

Colonial Trust Company's business activity includes, but is not limited to, investment management of fiduciary accounts. The investment management portion of his responsibilities at Colonial Trust Company is very similar to those with Colonial Trust Advisors, Inc. Relationships or entities requiring the degree of fiduciary supervision consistent with the role of a corporate trustee, estate settlement, or escrow agent are handled entirely by Colonial Trust Company. To the contrary, relationships requiring traditional investment management services only are administered entirely by Colonial Trust Advisors, Inc. As such there is no overlap of service offerings limiting any conflicts of interest between the two firms. Colonial Trust Company and Colonial Trust Advisors, Inc. do refer business to each other based on the type of service needed. The separation of responsibilities and differing regulatory structure of the two firms are clearly disclosed to each client and prospective client.

For his role with Colonial Trust Company, Jimmy is paid a salary and has bonus potential based on the firm's total book of business, not related to any relationship or business activity quota. No other compensation is earned for the sale of securities or other investment products.

Jimmy is licensed to sell insurance in South Carolina and is entitled to receive commissions or other remuneration on the sale of insurance products. As such, Jimmy will be able to effect insurance transactions and will receive separate, yet customary compensation. To protect client interests, our policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will you pay both a commission to Jimmy and a management fee to Colonial Trust Advisors, Inc. on the same pool of assets.

Item 5 – Additional Compensation

Except as stated above, Jimmy has no other income or compensation to disclose.

Item 6 – Supervision

H. Walter Barre II, Chief Operating Officer of Colonial Trust Advisors, Inc., and Barry D. Wynn, President of Colonial Trust Advisors, Inc., supervise all duties and activities of the firm. Their contact information is on the cover page of this disclosure document.

Colonial Trust Advisors, Inc. provides investment management services through a team based approach. Though a client may have one particular relationship manager, the firm's investment committee is collectively responsible for reviewing the criteria of securities, including specific individual equity securities, ETFs and mutual funds that are the focus of the firm's investment strategy.

The investment committee reviews portfolio investment performance across accounts regardless of the assigned portfolio manager. Colonial Trust Advisors, Inc. also utilizes portfolio management and trade order management software to track portfolio objectives, appropriate asset allocations, and enforce client limitations and trade restrictions.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Kathryn A. Smith, CFP®, PFS, CPA
CRD# 5818765

101 E. Washington St.
Suite 200
Greenville, South Carolina 29602
(864) 370-0737

of



359 S. Pine Street
Spartanburg, South Carolina 29302

(864) 582-3356

www.colonialtrust.com

May 4, 2021

This Brochure Supplement provides information about Kathryn Smith, and supplements the Colonial Trust Advisors, Inc. (formerly Colonial Asset Management, Inc.) Brochure. You should have received a copy of that Brochure. Please contact us at (864) 582-3356 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 – Educational Background and Business Experience

Kathryn A. Smith (year of birth 1988) joined Colonial Trust Advisors, Inc. in 2021 as a Financial Planner. Prior to joining the firm, she worked as a Financial Planner at FinTrust Capital Advisors in Greenville, South Carolina. From 2015 to 2018, Kathryn was an Advanced Staff Accountant at Ramage Lewis, LLC. From 2013 through

2015, she also served in the positions of Independent Tax Contractor for Graydon Thompson, LLC, and Tax Associate for BDO USA, LLP.

Kathryn earned a Bachelor of Science from the Lees-McRae College, and a Master of Accountancy and Certificate in Financial Planning from Appalachian State University. She is a CPA* and earned the PFS** designation. Kathryn is also a CERTIFIED FINANCIAL PLANNER™ *** professional.

*A CPA is a Certified Public Accountant. All CPA candidates must pass the Uniform CPA Examination to qualify for a CPA certificate and license to practice public accounting. While the exam is the same regardless of where it is taken, every state/jurisdiction has its own set of education and experience requirements that individuals must meet. However, most states require at least a bachelor's degree and a concentration in accounting, and at least one year of public accounting experience under the supervision of or verification by a CPA. Once the designation is attained, the CPA is required to meet continuing education requirements.

**The PFS designation is granted exclusively to CPAs with the combination of extensive tax expertise and comprehensive knowledge of personal financial planning. The requirements for the PFS credential are established by the PFP (Personal Financial Planning) staff at the AICPA (American Institute of CPAs), the National Accreditation Commission, along with the PFS Credential Committee, and accurately reflect the depth and breadth of experience and technical expertise required to obtain this credential. The 5 major requirements are: (1) Obtain CPA licensure (2) join the AICPA and be a member in good standing (3) complete a comprehensive PFP education, consisting of a minimum of 80 hours of PFP training and education within the five year period preceding the date of the PFS application (4) fulfill 3,000 hours of personal financial planning business experience and (5) pass a PFS examination.

*** The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

Item 3 – Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Kathryn has no such disciplinary information to report.

Item 4 – Other Business Activities

Kathryn is also employed by Colonial Trust Company. Both Colonial Trust Advisors, Inc. and Colonial Trust Company are wholly owned subsidiaries of Colonial Group, Inc. Colonial Trust Company is registered with and regulated by the South Carolina Board of Financial Institutions and provides professional fiduciary services including personal trust and estate related services.

Kathryn holds the title of Financial Planner at Colonial Trust Company and is involved in the investment management aspect of the firm. Approximately 33% of her time is spent on the business of Colonial Trust Company with the remaining 67% being spent on Colonial Trust Advisors, Inc. business.

Colonial Trust Company's business activity includes, but is not limited to, investment management of fiduciary accounts. The investment management portion of her responsibilities at Colonial Trust Company is very similar to those with Colonial Trust Advisors, Inc. Relationships or entities requiring the degree of fiduciary supervision

consistent with the role of a corporate trustee, estate settlement, or escrow agent are handled entirely by Colonial Trust Company. To the contrary, relationships requiring traditional investment management services only are administered entirely by Colonial Trust Advisors, Inc. As such there is no overlap of service offerings limiting any conflicts of interest between the two firms. Colonial Trust Company and Colonial Trust Advisors, Inc. do refer business to each other based on the type of service needed. The separation of responsibilities and differing regulatory structure of the two firms are clearly disclosed to each client and prospective client.

For her role with Colonial Trust Company, Kathryn is paid a salary and has bonus potential based on the firm's total book of business, not related to any relationship or business activity quota. No other compensation is earned for the sale of securities or other investment products.

Kathryn is licensed to sell insurance in South Carolina and is entitled to receive commissions or other remuneration on the sale of insurance products. As such, Kathryn will be able to effect insurance transactions and will receive separate, yet customary compensation. To protect client interests, our policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will you pay both a commission to Kathryn and a management fee to Colonial Trust Advisors, Inc. on the same pool of assets.

Item 5 – Additional Compensation

Except as stated above, Kathryn has no other income or compensation to disclose.

Item 6 – Supervision

H. Walter Barre II, Chief Operating Officer of Colonial Trust Advisors, Inc., and Barry D. Wynn, President of Colonial Trust Advisors, Inc., supervise all duties and activities of the firm. Their contact information is on the cover page of this disclosure document.

Colonial Trust Advisors, Inc. provides investment management services through a team based approach. Though a client may have one particular relationship manager, the firm's investment committee is collectively responsible for reviewing the criteria of securities, including specific individual equity securities, ETFs and mutual funds that are the focus of the firm's investment strategy.

The investment committee reviews portfolio investment performance across accounts regardless of the assigned portfolio manager. Colonial Trust Advisors, Inc. also utilizes portfolio management and trade order management software to track portfolio objectives, appropriate asset allocations, and enforce client limitations and trade restrictions.