

***Form ADV, Part 2B***

***BROCHURE SUPPLEMENT***

March 1, 2023

Chesapeake Investment Management LLC  
1501 Farm Credit Dr.  
Suite 2450  
McLean, VA 22101  
202-821-1530 (O)  
202-821-1530 (FAX)  
[WWW.CHESAPEAKEIM.COM](http://WWW.CHESAPEAKEIM.COM)

This brochure provides information about each supervised investment adviser of Chesapeake Investment Management, LLC. If you have any questions about the contents of this supplement, please contact us at 202-821-1530 and /or [info@chesapeakeim.com](mailto:info@chesapeakeim.com). The information in this supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Chesapeake Investment Management, LLC also is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

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## **Item 1**

### **Scott E. Beck** **Chesapeake Investment Management LLC**

1501 Farm Credit Dr.  
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McLean, VA 22102  
202-821-1530 (O)  
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March 1, 2023

This brochure supplement provides information about Scott E. Beck that supplements the Chesapeake Investment Management, LLC (CIM) Brochure Part 2A. You should have received a copy of that brochure. Please contact [info@chesapeakeim.com](mailto:info@chesapeakeim.com) if you did not receive Chesapeake Investment Management's brochure Part 2A or if you have any questions about the contents of this supplement.

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

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

**Scott E. Beck**, President, Chesapeake Investment Management, LLC

Date of Birth: March 14, 1955

Education: 1978 University of South Carolina, B.S. Finance and Marketing

Business Background:

1980-1998 Senior Vice President, Portfolio Manager, Johnston, Lemon & Co. Incorporated and JL Capital Management.

1998-2001 Partner, Columbia Financial Advisors, LLP

2002-Present, President, Chesapeake Investment Management, LLC

### **Item 3 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. There are currently no legal or disciplinary actions or previous disciplinary occurrences that Chesapeake Investment Management, LLC or its representatives have been involved in.

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

Mr. Beck is not actively engaged in any investment related business or occupation outside of Chesapeake Investment Management, LLC.

### **Item 5 – Additional Compensation**

Mr. Beck does not receive additional compensation for advisory services provided to clients of Chesapeake Investment Management, LLC.

### **Item 6 - Supervision**

CIM's Code of Ethics sets forth the ethical and fiduciary principles and related compliance requirements under which CIM must operate its business and the procedures for implementing those principles. CIM is a fiduciary of its Clients and owes each Client an affirmative duty of good faith and full and fair disclosure of all material facts. The SEC has stated that this duty is particularly pertinent whenever the adviser is in a situation involving a conflict or potential conflict of interest. We must affirmatively exercise authority and responsibility for the benefit of Clients and may not participate in any activities that may conflict with the interests of Clients. In addition, we must avoid activities, interests and relationships that might interfere or appear to interfere with making decisions in the best interests of our Clients. Accordingly, at all times, we must conduct our business as set forth in our Code of Ethics. CIM will provide a copy of our Code of Ethics to any client or prospective client upon request.

It is the expressed policy of CIM, that no employee may purchase or sell any security (other than mutual fund shares) prior to a transaction(s) being implemented for an advisory account thus preventing such person from benefitting from transactions placed on behalf of advisory accounts. CIM employees may buy or sell securities identical to those recommended to clients for their personal accounts. Additionally, employees may have an interest or position in a certain security which may also be recommended to a client. As these situations represent a conflict of interest, CIM has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1.) An employee of CIM shall not buy or sell securities for his or her personal portfolio where his/her decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No employee shall prefer his or her interest to that of an advisory client.

2.) CIM maintains a list of all securities holdings for itself, and anyone associated with the advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by CIM.

3.) CIM emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where CIM is granted discretionary authority for the client's account.

4.) CIM requires that all employees act in accordance with all available federal and state securities regulation and rules governing investment advisors.

5.) Any person not in observance of the above is subject to termination.

Mr. Beck is supervised by the firm's Vice President, E. Antonio Sarrge. Mr. Sarrge can be reached at 202-821-1530.

### **Item 7 – Requirements for State-Registered Advisers**

Registered investment advisers are required to disclose additional information if they have ever been the subject of a bankruptcy petition or been found liable in either: (a) an arbitration; or (b) a civil, self-regulatory organization, or administrative proceeding. As none of these apply to Mr. Beck, Mr. Beck has no information to disclose in this regard.

## **Item 2**

### **E. Antonio Sarrge Chesapeake Investment Management LLC**

1501 Farm Credit Dr.  
Suite 2450  
McLean, VA 22102  
202-821-1530 (O)  
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March 1, 2023

This brochure supplement provides information about E. Antonio Sarrge that supplements the Chesapeake Investment Management, LLC Brochure Part 2A. You should have received a copy of that brochure. Please contact [info@chesapeakeim.com](mailto:info@chesapeakeim.com) if you did not receive Chesapeake Investment Management's brochure or if you have any questions about the contents of this supplement.

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

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

**E. Antonio Sarrge**, Vice President, Chesapeake Investment Management, LLC

Date of Birth: July 18, 1968

Education: George Mason University B.S. Accounting

### **Business Background:**

1999-2002 Principal, Columbia Financial Advisors, LLP

2002-2004 Portfolio Manager, Folger, Nolan, Fleming & Douglas, Capital Management Group

2004-Present Vice President, Chesapeake Investment Management, LLC

### **Item 3 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. There are currently no legal or disciplinary actions or previous disciplinary occurrences that Chesapeake Investment Management, LLC or its representatives have been involved in.

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

Mr. Sarrge is not actively engaged in any investment related business or occupation outside of Chesapeake Investment Management, LLC.

### **Item 5 – Additional Compensation**

Mr. Sarrge does not receive additional compensation for advisory services provided to clients of Chesapeake Investment Management.

### **Item 6 - Supervision**

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- 3.) CIM emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where CIM is granted discretionary authority for the client's account.
- 4.) CIM requires that all employees act in accordance with all available federal and state securities regulation and rules governing investment advisors.
- 5.) Any person not in observance of the above is subject to termination.

Mr. Sarrge is supervised by the firm's President and Chief Compliance Officer; Scott E. Beck. Mr. Beck can be reached at 202-821-1530.

### **Item 7 – Requirements for State-Registered Advisers**

Registered investment advisers are required to disclose additional information if they have ever been the subject of a bankruptcy petition or been found liable in either: (a) an arbitration; or (b) a civil, self-regulatory organization, or administrative proceeding. As none of these apply to Mr. Sarrge, Mr. Sarrge has no information to disclose in this regard.



**Item 3**

**John A. Edwards, CFA**  
**Chesapeake Investment Management LLC**

1501 Farm Credit Dr.  
Suite 2450  
McLean, VA 22102  
202-821-1530 (O)  
202-821-1530 (FAX)  
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March 1, 2023

This brochure supplement provides information about John A. Edwards that supplements the Chesapeake Investment Management, LLC (CIM) Brochure Part 2A. You should have received a copy of that brochure. Please contact [info@chesapeakeim.com](mailto:info@chesapeakeim.com) if you did not receive Chesapeake Investment Management's brochure Part 2A or if you have any questions about the contents of this supplement.

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

**Item 2 – Educational Background and Experience**

**John A. Edwards**, Director/Portfolio Manager, Chesapeake Investment Management, LLC

Date of Birth: April 25, 1960

Education: 1982 University of Maryland, B.S. Microbiology

1987 University of Maryland, M.B.A., Finance

1991 Certified Financial Analyst, Charter Awarded

Business Background:

1988-1996 GIT Investment Funds, Portfolio Manager to various equity and fixed income funds.

1996-2002 First Virginia Bank, Asset Management Services

2003-2010 Chevy Chase Trust, ASB Capital Management, Senior Portfolio Manager

2010-2012 Evermay Wealth Management, Senior Portfolio Manager

2012-Present Chesapeake Investment Management, LLC, Director/Portfolio Manager

**Item 3 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. There are currently no legal or disciplinary actions or previous disciplinary occurrences that Chesapeake Investment Management, LLC or its representatives have been involved in.

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

Mr. Edwards does not receive additional compensation for advisory services provided to clients of Chesapeake Investment Management.

**Item 6 - Supervision**

CIM's Code of Ethics sets forth the ethical and fiduciary principles and related compliance requirements under which CIM must operate its business and the procedures for implementing those principles. CIM is a fiduciary of its Clients and owes each Client an affirmative duty of good faith and full and fair disclosure of all material facts. The SEC has stated that this duty is particularly pertinent whenever the adviser is in a situation involving a conflict or potential conflict of interest. We must affirmatively exercise authority and responsibility for the benefit of Clients and may not participate in any activities that may conflict with the interests of Clients. In addition, we must avoid activities, interests and relationships that might interfere or appear to interfere with making decisions in the best interests of our Clients. Accordingly, at all times, we must conduct our business as set forth in our Code of Ethics. CIM will provide a copy of our Code of Ethics to any client or prospective client upon request.

It is the expressed policy of CIM, that no employee may purchase or sell any security (other than mutual fund shares) prior to a transaction(s) being implemented for an advisory account thus preventing such person from benefitting from transactions placed on behalf of advisory accounts. CIM employees may buy or sell securities identical to those recommended to clients for their personal accounts. Additionally, employees may have an interest or position in a certain security which may also be recommended to a client. As these situations represent a conflict of interest, CIM has established the following restrictions in order to ensure its fiduciary responsibilities:

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3.) CIM emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where CIM is granted discretionary authority for the client's account.

4.) CIM requires that all employees act in accordance with all available federal and state securities regulation and rules governing investment advisors.

5.) Any person not in observance of the above is subject to termination.

Mr. Edwards is supervised by the firm's President and Chief Compliance Officer; Scott E. Beck. Mr. Beck can be reached at 202-821-1530.

### **Item 7 – Requirements for State-Registered Advisers**

Registered investment advisers are required to disclose additional information if they have ever been the subject of a bankruptcy petition or been found liable in either: (a) an arbitration; or (b) a civil, self-regulatory organization, or administrative proceeding. As none of these apply to Mr. Edwards, Mr. Edwards has no information to disclose in this regard.

## **Item 4**

### **Maureen S. Bigger, CFP Chesapeake Investment Management LLC**

1501 Farm Credit Dr.

Suite 2450

McLean, VA 22102

202-821-1530 (O)

202-821-1530 (FAX)

[WWW.CHESAPEAKEIM.COM](http://WWW.CHESAPEAKEIM.COM)

March 1, 2023

This brochure supplement provides information about Maureen Bigger that supplements the Chesapeake Investment Management, LLC Brochure Part 2A. You should have received a copy of that brochure. Please contact [info@chesapeakeim.com](mailto:info@chesapeakeim.com) if you did not receive Chesapeake Investment Management's brochure or if you have any questions about the contents of this supplement.

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

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

**Maureen S. Bigger**, Investment Advisor Representative, Chesapeake Investment Management, LLC

Date of Birth: November 18, 1956

Education: 2000 George Mason University B.S. Finance

2008 Certified Financial Planning Board of Standards, Inc., CFP Designation

To become a CFP, designee must take a series of six courses and pass six course tests plus a comprehensive test administered by the Certified Financial Planning Board of Standards, Inc. which covers all facets of financial planning.

Business Background:

2003-2005 Mass Mutual Life Insurance

2005-Present Bigger & Company, Inc

2007-Present Investment Advisor Representative, Chesapeake Investment Management, LLC

### **Item 3 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. There are currently no legal or disciplinary actions or previous disciplinary occurrences that Chesapeake Investment Management, LLC or its representatives have been involved in.

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

In addition to being an investment advisor representative of Chesapeake Investment Management LLC is also President of Bigger & Company, an insurance agency. Bigger & Company is a separate, distinct and an unrelated business from Chesapeake Investment Management LLC.

- A.) Ms. Bigger is not actively engaged in any investment related business or occupation outside of Chesapeake Investment Management, LLC.
- B.) Ms. Bigger is actively engaged in the insurance business through Bigger & Company, which provides a substantial source of her income and time. Services provided by Bigger & Company include health, life, property and casualty and long-term care insurance.

### **Item 5 – Additional Compensation**

Ms. Bigger does not receive additional compensation for advisory services provided to clients of Chesapeake Investment Management LLC.

### **Item 6 - Supervision**

CIM's Code of Ethics sets forth the ethical and fiduciary principles and related compliance requirements under which CIM must operate its business and the procedures for implementing those principles. CIM is a fiduciary of its Clients and owes each Client an affirmative duty of good faith and full and fair disclosure of all material facts. The SEC has stated that this duty is particularly pertinent whenever the adviser is in a situation involving a conflict or potential conflict of interest. We must affirmatively exercise authority and responsibility for the benefit of Clients and may not participate in any activities that may conflict with the interests of Clients. In addition, we must avoid activities, interests and relationships that might interfere or appear to interfere with making decisions in the best interests of our Clients. Accordingly, at all times, we must conduct our business as set forth in our Code of Ethics. CIM will provide a copy of our Code of Ethics to any client or perspective client upon request.

It is the expressed policy of CIM, that no employee may purchase or sell any security (other than mutual fund shares) prior to a transaction(s) being implemented for an advisory account

thus preventing such person from benefitting from transactions placed on behalf of advisory accounts. CIM employees may buy or sell securities identical to those recommended to clients for their personal accounts. Additionally, employees may have an interest or position in a certain security which may also be recommended to a client. As these situations represent a conflict of interest, CIM has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1.) An employee of CIM shall not buy or sell securities for his or her personal portfolio where his/her decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No employee shall prefer his or her interest to that of an advisory client.
- 2.) CIM maintains a list of all securities holdings for itself, and anyone associated with the advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by CIM.
- 3.) CIM emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where CIM is granted discretionary authority for the client's account.
- 4.) CIM requires that all employees act in accordance with all available federal and state securities regulation and rules governing investment advisors.
- 5.) Any person not in observance of the above is subject to termination.

Ms. Bigger is supervised by the firm's Chief Compliance Officer, Scott E. Beck. Mr. Beck can be reached at 202-821-1530.

### **Item 7 – Requirements for State-Registered Advisers**

Registered investment advisers are required to disclose additional information if they have ever been the subject of a bankruptcy petition or been found liable in either: (a) an arbitration; or (b) a civil, self-regulatory organization, or administrative proceeding. As none of these apply to Ms. Bigger, Ms. Bigger has no information to disclose in this regard.

## Item 5

### **Maedi Tanham Carney, CFP Chesapeake Investment Management LLC**

1501 Farm Credit Dr.

Suite 2450

McLean, VA 22102

202-821-1530 (O)

202-821-1530 (FAX)

[WWW.CHESAPEAKEIM.COM](http://WWW.CHESAPEAKEIM.COM)

March 1, 2023

This brochure supplement provides information about Maedi Tanham Carney that supplements the Chesapeake Investment Management, LLC (CIM) Brochure Part 2A. You should have received a copy of that brochure. Please contact [info@chesapeakeim.com](mailto:info@chesapeakeim.com) if you did not receive Chesapeake Investment Management's brochure Part 2A or if you have any questions about the contents of this supplement.

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

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

**Maedi Tanham Carney**, Investment Advisor Representative, Chesapeake Investment Management, LLC

Date of Birth: January 26, 1961

Education: 1983 University of Denver B.S. Finance

1992 Certified Financial Planning Board of Standards, Inc., CFP Designation

To become a CFP, designee must take a series of six courses and pass six course tests plus a comprehensive test administered by the Certified Financial Planning Board of Standards, Inc. which covers all facets of financial planning.

**Business Background:**

2003 – 2005 Choat Company

2005 – 2007 Potomac Financial

2005 – 2008 Studley Inc.

2008 – Present M&L Special Needs Planning, LLC

2008 – Present, Registered Investment Advisor Representative, Chesapeake Investment Management, LLC.

**Item 3 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. There are currently no legal or disciplinary actions or previous disciplinary occurrences that Chesapeake Investment Management, LLC or its representatives have been involved in.

**Item 4 – Other Business Activities**

In addition to being an investment advisor representative of Chesapeake Investment Management LLC is also President of M&L Special Needs Planning, LLC, a financial planning firm focused on serving families with individual(s) that have special needs. M&L Special Needs Planning, LLC is a separate, distinct and an unrelated business from Chesapeake Investment Management LLC. M&L Special Needs Planning, LLC is not registered as an investment advisor and does not provide these services to its clients.

- A.) Ms. Carney is not actively engaged in any investment related business or occupation outside of Chesapeake Investment Management, LLC.
- B.) Ms. Carney is actively engaged in the financial planning and insurance business which provides a substantial source of her income and time. The financial planning and insurance business provided by M&L Special Needs Planning, LLC are geared to help special needs families.

**Item 5 – Additional Compensation**

Ms. Carney does not receive additional compensation for advisory services provided to clients of Chesapeake Investment Management LLC.

**Item 6 - Supervision**

CIM's Code of Ethics sets forth the ethical and fiduciary principles and related compliance requirements under which CIM must operate its business and the procedures for implementing those principles. CIM is a fiduciary of its Clients and owes each Client an affirmative duty of good faith and full and fair disclosure of all material facts. The SEC has stated that this duty is particularly pertinent whenever the adviser is in a situation involving a conflict or potential conflict of interest. We must affirmatively exercise authority and responsibility for the benefit



of Clients and may not participate in any activities that may conflict with the interests of Clients. In addition, we must avoid activities, interests and relationships that might interfere or appear to interfere with making decisions in the best interests of our Clients. Accordingly, at all times, we must conduct our business as set forth in our Code of Ethics. CIM will provide a copy of our Code of Ethics to any client or perspective client upon request.

It is the expressed policy of CIM, that no employee may purchase or sell any security (other than mutual fund shares) prior to a transaction(s) being implemented for an advisory account thus preventing such person from benefitting from transactions placed on behalf of advisory accounts. CIM employees may buy or sell securities identical to those recommended to clients for their personal accounts. Additionally, employees may have an interest or position in a certain security which may also be recommended to a client. As these situations represent a conflict of interest, CIM has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1.) An employee of CIM shall not buy or sell securities for his or her personal portfolio where his/her decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No employee shall prefer his or her interest to that of an advisory client.
- 2.) CIM maintains a list of all securities holdings for itself, and anyone associated with the advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by CIM.
- 3.) CIM emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where CIM is granted discretionary authority for the client's account.
- 4.) CIM requires that all employees act in accordance with all available federal and state securities regulation and rules governing investment advisors.
- 5.) Any person not in observance of the above is subject to termination.

Ms. Carney is supervised by the firm's Chief Compliance Officer, Scott E. Beck. Mr. Beck can be reached at 202-821-1530.

### **Item 7 – Requirements for State-Registered Advisers**

Registered investment advisers are required to disclose additional information if they have ever been the subject of a bankruptcy petition or been found liable in either: (a) an arbitration; or (b) a civil, self-regulatory organization, or administrative proceeding. As none of these apply to Ms. Carney, Ms. Carney has no information to disclose in this regard.

## **Item 5**

### **Barbara Frank Chesapeake Investment Management LLC**

1501 Farm Credit Dr.

Suite 2450

McLean, VA 22102

202-821-1530 (O)

202-821-1530 (FAX)

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March 1, 2023

This brochure supplement provides information about Maureen Bigger that supplements the Chesapeake Investment Management, LLC Brochure Part 2A. You should have received a copy of that brochure. Please contact [info@chesapeakeim.com](mailto:info@chesapeakeim.com) if you did not receive Chesapeake Investment Management's brochure or if you have any questions about the contents of this supplement.

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

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

**Barbara Frank**, Investment Advisor Representative, Chesapeake Investment Management, LLC

Date of Birth: October 23, 1939

Education: 1961 B.A. University of Arkansas, Modern Languages and Applied Music

1963 M.A. University of Massachusetts, Modern Languages and Literature

1975 Ph.D. Harvard University, Germanic Languages and Literature

1986 M.B.A. New York University, International Finance

**Business Background:**

1964-1965 Johann Wolfgang von Goethe University, Frankfurt, Lecturer  
1965-1967 Boston University, Instructor  
1967-1969 Howard University, Asst. Professor  
1969-1976 University of the District of Columbia, Associate Professor  
1980-1984 U.N. Development Program  
1984-1986 International Chamber of Commerce  
1986-1989 Merrill Lynch & Co., UIT Trust Division  
1989-1991 Credit Suisse, Private Banking  
1992-1998 Merrill Lynch International Private Client Services  
1984-2004 Montrose Advisors, NY  
2005-2007 Lara, Shull & May Ltd.  
2007-2009 Piedmont Advisors, Landsdowne, VA  
2009- Present, Chesapeake Investment Management, LLC

**Item 3 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. There are currently no legal or disciplinary actions or previous disciplinary occurrences that Chesapeake Investment Management, LLC or its representatives have been involved in.

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

Ms. Frank does not receive additional compensation for advisory services provided to clients of Chesapeake Investment Management.

**Item 6 - Supervision**

CIM's Code of Ethics sets forth the ethical and fiduciary principles and related compliance requirements under which CIM must operate its business and the procedures for implementing those principles. CIM is a fiduciary of its Clients and owes each Client an affirmative duty of good faith and full and fair disclosure of all material facts. The SEC has stated that this duty is particularly pertinent whenever the adviser is in a situation involving a conflict or potential conflict of interest. We must affirmatively exercise authority and responsibility for the benefit of Clients and may not participate in any activities that may conflict with the interests of Clients. In addition, we must avoid activities, interests and relationships that might interfere or appear to interfere with making decisions in the best interests of our Clients. Accordingly, at all times, we must conduct our business as set forth in our Code of Ethics. CIM will provide a copy of our Code of Ethics to any client or prospective client upon request.

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- 5.) Any person not in observance of the above is subject to termination.

Ms. Frank is supervised by the firm's President and Chief Compliance Officer; Scott E. Beck. Mr. Beck can be reached at 202-821-1530.

### **Item 7 – Requirements for State-Registered Advisers**

Registered investment advisers are required to disclose additional information if they have ever been the subject of a bankruptcy petition or been found liable in either: (a) an arbitration; or (b) a civil, self-regulatory organization, or administrative proceeding. As none of these apply to Ms. Frank, Ms. Frank has no information to disclose in this regard.