

Introducing Creative Capital Management Investments LLC

Creative Capital Management Investments LLC (“CCMI LLC”) provides financial and investment advisory services on a fee-only basis. We work with high net worth individuals, professionals, and owners of closely held businesses, retirement plans, and families in business addressing all aspects of their financial well-being. On a referral basis, we also work with individuals who have specific financial concerns, primarily in the areas of estate planning/estate settlement, tax planning, divorce settlements, inheritance, succession planning, retirement planning, and money management.

In providing financial advice on an hourly fee basis, CCMI LLC offers clients a wide range of services, from tax planning to advice on selling a business, from retirement planning and sound retirement funding strategies to preparing clients to meet with an estate-planning attorney regarding wills and trusts, from break-even analysis to cash flow projections, and from management succession to equity-sharing arrangements for a family business, to mention a few. All of the services pertain to the financial health of CCMI LLC clients and are customized to each client’s particular financial situation. Once an initial financial plan or analysis is completed, clients may opt for periodic reviews of their financial plan. These reviews are normally provided on an hourly fee basis.

In the investment management service area, we manage clients’ funds with long-term results in mind rather than short-term profits. The firm’s investment professionals primarily utilize institutional class mutual funds, Exchange Traded Funds (ETFs), real estate investment trusts (REITs), bonds, and bank instruments. Each portfolio is designed to meet each client’s personal investment objectives.

CCMI LLC offers personalized and responsive services to our clients. In addition, we subscribe to a written code of ethics that outlines standards of ethical conduct that govern our firm and all of its employees. Our code of ethics reflects the fiduciary standard under which we operate our firm in that we are required to act in the best interest of our clients.

Creative Capital Management Investments LLC Firm Brochure

Thank you for selecting Creative Capital Management Investments LLC as your financial advisory firm.

We feel it is important that you understand who we are, the services we provide, how we provide them, and how we are compensated. We hope you will find the attached information helpful.

As our firm is a Registered Investment Advisor (RIA) with the United States Securities and Exchange Commission (SEC), there are several compliance areas in which we will need your assistance. One of these is to ask you to read over the attached brochure, additional supplement, and our privacy policy. The language that follows in the attached material and disclosure language is at times rather formal; however, we must provide you with the information in this format to comply with regulations. You will find our normal correspondence to be much more "reader-friendly." We appreciate your understanding in this regard and, of course, welcome any questions you may have about the information provided.

Our firm's reputation has been built on trust *and, as we are held to a fiduciary standard*, we are required to act in the best interest of our clients. We believe this is the right and only way to conduct our business. We have worked diligently to earn our clients' confidence. We want you to feel completely comfortable with the information presented in this brochure, so that a mutually beneficial relationship will result from our association. If you have any questions regarding our firm, the scope of services provided, or our fees, we encourage you to bring them to our attention at any time.

We look forward to working with you to help enhance your financial future!



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CCMI Firm Brochure
Dated September 6, 2022


















This brochure provides information about the qualifications and business practices of Creative Capital Management Investments LLC (CCMILLC). If you have any questions about the contents of this brochure, please contact us at (619) 298-3993 or brian@myccmi.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. Additional information about Creative Capital Management Investments LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

References herein to Creative Capital Management Investments LLC as a "registered investment adviser" or any reference being "registered" does not imply a certain level of skill or training.

Item 2 Material Changes

Since CCMI LLC filed its last annual amendment of Form ADV on March 28, 2022, this brochure has not been materially amended.

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Item 4 Advisory Business

- A. Creative Capital Management Investments LLC (“CCMI LLC”) was formed on June 9, 2016 in the state of California and became registered as an investment adviser with the SEC in 2017, thereby continuing many of the client relationships established by its predecessor firm, Creative Capital Management, Inc., which was founded in 1980. CCMI LLC is wholly owned in equal parts by JAMES Family Holdings and M. Ohana Holdings. JAMES Holdings and M. Ohana Holdings are wholly owned by Matt Showley and Brian Matter, respectively. We are a fee only firm, which means our only compensation comes from clients and not any other individuals or entities.
- B. As discussed below, CCMI LLC offers investment advisory services to its clients, and, to the extent specifically requested by a client, financial planning and related consulting services.

INVESTMENT ADVISORY SERVICES

The client can decide to engage CCMI LLC to provide discretionary investment advisory services on a fee-only basis. We manage our advisory accounts on a discretionary basis. This means that we make trades without discussing it with the client beforehand using the client’s stated objectives to guide our actions. CCMI LLC does not use its discretionary authority to transfer funds into or out of any managed account, as the advisors can only make trades within the account without the client’s consent.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent requested by a client, CCMI LLC may provide financial planning or consulting services (including investment and non-investment related matters, including estate, tax, and insurance planning,) on a stand-alone separate fee basis. Neither CCMI LLC, nor any of its representatives, serves as an attorney, accountant, or licensed insurance agent, and no portion of CCMI LLC’s services should be construed as legal or accounting services. CCMI LLC may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any recommended professional. The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation from CCMI LLC. If the client engages any recommended professional, and a dispute arises, the client agrees to seek recourse exclusively from the engaged professional. It remains the client’s responsibility to promptly notify CCMI LLC if there is ever any change in their financial situation or investment objectives so that CCMI LLC can review, and if necessary update its previous recommendations.

FINANCIAL PLANNING PROCESS

In order to introduce CCMI LLC to the client, review the client’s personal financial or business planning needs, and determine the scope of services the client desires, this first appointment usually takes approximately one hour, for which there may be no charge. Thereafter, CCMI LLC’s normal hourly fee applies.

Prior to initiating any financial planning services for the client, in follow-up correspondence CCMI LLC will summarize the financial concerns discussed in the meeting and the fees required to complete the financial plan. CCMI requests an initial retainer fee from the client and provides the client with regulatory disclosures and agreements to begin the planning process. An outline of any additional data needed for the analysis will then be provided. Upon receipt of all

of the additional data or information requested and the retainer fee, CCMI LLC will begin the work for the client's benefit. Once the plan or project is completed, the client will receive a final invoice detailing the work done by members of the CCMI LLC team and the balance of the fee due.

Once CCMI LLC has completed a preliminary summary focusing on the financial objectives, financial data and assumptions, and priorities the client develops and verifies with CCMI LLC's input, CCMI LLC will provide conclusions and recommendations to the client. CCMI LLC will review the recommendations with the client at the follow up meeting and the client is free to implement any or all of CCMI LLC's recommendations. The financial planning engagement is considered completed when the client reviews the plan with CCMI LLC. Assistance with implementation items is available upon request on an hourly fee basis.

Clients are encouraged to periodically review their financial progress. Upon client request, CCMI LLC provides financial planning reviews that might target a specific concern or provide a general reassessment of the client's overall financial progress. These reviews are also provided on a fee-only basis.

All of the planning services are based on information provided by the client. This data is kept confidential and is shared with third parties only as permitted by law or with prior client consent. This includes situations when client information must be disclosed during examinations performed by the SEC. At times, CCMI may need to consult with the client's other advisors, such as an attorney, accountant, trust officer, or insurance agent. It is helpful to have access to members of the client's professional advisory team and, as such, CCMI LLC will ask for either verbal or written permission from the client to do so.

Miscellaneous financial advice is also available on an hourly fee basis. Reviewing areas such as mortgage options, tax planning, or financial concerns of a limited scope come under this general heading and can be provided on an hourly fee basis.

FIRST STEP FINANCIAL PLANNING SERVICES

First Step Financial Plan

In addition to our traditional financial planning services, we have a First Step Financial Plan offering, suitable for clients with less complex financial lives, also provided on a fee-only basis. Generally, this offering is best suited for clients who have not yet acquired a high level of wealth and are interested in financial planning for the first time. The CCMI LLC First Step Financial Plan process provides personalized solutions and recommendations based on a client's particular financial concerns; thus, for these clients, we will need to review the aforementioned financial information.

The financial areas that are commonly addressed in a First Step Financial Plan include: properly allocating a company retirement plan, saving to buy a home, navigating the student loan repayment process, establishing a budget for ongoing expenses, learning to optimally allocate extra cash flow, planning for a child's college education, and establishing an estate plan or proper life insurance coverage. First Step Financial plans generally do not focus on retirement planning, but rather on optimizing the use of available funds over 10 or 15 years; specific retirement planning would need to be completed at a later time.

MISCELLANEOUS

Limitations of Financial Planning and Non-Investment Consulting and Implementation Services.

When CCMI LLC provides financial planning and consulting services, including through its First Step Financial Plan offering, it can provide advice on investment and non-investment related matters, such as estate, tax, and insurance planning. CCMI LLC does not serve as a law firm, accounting firm, or insurance agency, and no portion of CCMI LLC's services should be construed as legal, accounting, or insurance advice requiring licensing. Accordingly, CCMI LLC does not prepare estate planning documents, tax returns or sell insurance products. To the extent requested by a client, CCMI LLC may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, and insurance agents). Clients are reminded that they are under no obligation to engage the services of any recommended professional. The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation made by CCMI LLC or its representatives: If the client engages any recommended professional, and a dispute arises, the client agrees to seek recourse exclusively from the engaged professional.

Retirement Rollovers. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If the CCMI LLC recommends that a client roll over their retirement plan assets into an account to be managed by CCMI LLC, such a recommendation creates a conflict of interest if CCMI LLC will earn new (or increase its current) compensation as a result of the rollover. Whether CCMI LLC provides a recommendation as to whether a client should engage in a rollover or not, CCMI LLC is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. No client is under any obligation to roll over retirement plan assets to an account managed by CCMI LLC. CCMI LLC's Chief Compliance Officer, Brian Matter, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by a rollover recommendation.

Independent Managers. CCMI LLC may allocate a portion of a client's investment assets to unaffiliated independent investment managers (each an "Independent Manager") in accordance with the client's designated investment objectives. The Independent Manager will have day-to-day responsibility for the active discretionary management of the allocated assets. CCMI LLC will continue to monitor and review the client's account performance, asset allocation and investment objectives. The factors CCMI LLC considers in recommending Independent Managers includes the client's investment objectives, and the manager's management style, performance, reputation, financial strength, reporting, research and pricing. The investment management fee charged by the Independent Manager[s] is separate from, and in addition to, CCMI LLC's investment advisory fee disclosed at Item 5 below in Item 5.

Reporting Services. CCMI LLC can also provide account reporting services, which can incorporate client investment assets that are not part of the assets that CCMI LLC manages (the “Excluded Assets”). Unless agreed to otherwise, in writing, **the client and/or his/her/its other advisors that maintain trading authority, and not CCMI LLC, shall be exclusively responsible for the investment performance of the Excluded Assets.** Unless also agreed to otherwise, in writing, CCMI LLC does not provide investment management, monitoring or implementation services for the Excluded Assets. The client can engage CCMI LLC to provide investment management services for the Excluded Assets pursuant to the terms and conditions of the *Investment Advisory Agreement* between CCMI LLC and the client.

Client Obligations. In performing its services, CCMI LLC is not required to verify any information received from the client or from the client’s other professionals and will not be responsible for relying on that information. Clients are responsible for notifying CCMI LLC if there is ever any change in their financial situation or investment objectives so that it can review, and if necessary revise its previous recommendations.

- C. CCMI LLC provides investment advisory services specific to the needs of each client. Prior to providing services, an investment adviser representative will determine each client’s investment objectives. Thereafter, CCMI LLC shall invest or recommend that the client invest their assets consistent with their investment objectives. The client may, at any time, impose reasonable restrictions, in writing, on CCMI LLC’s services.
- D. CCMI LLC does not participate in a wrap fee program.
- E. As of December 31, 2021, CCMI LLC had \$510,188,103 in assets under management on a discretionary basis and \$0 in assets under management on a non-discretionary basis.

Item 5 Fees and Compensation

INVESTMENT ADVISORY SERVICES

CCMI’s annual investment advisory fee is based on a percentage (%) of the market value of the assets placed under CCMI LLC’s management. The current annual fee for CCMI LLC investment advisory services is billed in arrears in quarterly installments based on the average daily balance of the portfolio per quarter as follows:

- 1.0% of assets valued between \$0 and \$1 million
- .80% of assets valued between \$1,000,001 and \$2 million
- .60% of assets valued between \$2,000,001 and \$3 million
- .40% of assets in excess of \$3 million

Unless authorized to be debited directly from the client’s account, investment advisory fees are due upon receipt of the invoice and are non-negotiable. Any changes to this fee schedule will be sent to clients at least thirty days in advance. Although currently CCMI LLC is not billing for cash in money market accounts, at some future date, all cash and cash equivalents (money markets, etc.) can be included as part of assets under management for purposes of calculating CCMI

LLC's advisory fee.

When a managed portfolio is established, the first quarterly investment advisory fee will be billed at the end of the first quarter and will be prorated for the time the funds were under CCMI LLC's direction based on the average daily balance during the quarter. CCMI reserves the right to charge a portfolio setup fee.

The ideal minimum portfolio size at CCMI LLC is \$500,000; however, depending on the relationship the client or their family has with the firm, smaller portfolios may be accommodated on a specialized basis. CCMI LLC may, but is not required to, include one or more related families for the purposes of determining advisory fees (often referred to as "householding"). CCMI LLC is under no obligation to household any client accounts. CCMI LLC shall generally price its advisory services based upon various objective and subjective factors. As a result, our clients could pay diverse fees based upon the type, amount and market value of their assets, the anticipated complexity of the engagement, the anticipated level and scope of the overall investment advisory services to be rendered. Additionally, CCMI LLC, in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts or households, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** Registrant's Chief Compliance Officer, Brian Matter, remains available to address any questions that a client or prospective client may have regarding advisory fees.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

For Investment Advisory clients with liquid assets in excess of \$3 million, Financial Planning services are provided to the client for no additional fee. For all other clients, CCMI LLC's planning and consulting fees are negotiable, but generally range from \$1,500 to \$10,000, depending on the number of hours involved. Hourly fees range from \$70 to \$240 depending upon the level and scope of the services required and the professional rendering the services. Prior to engaging CCMI LLC to provide financial planning or consulting services, clients are required to sign a *Financial Planning and Consulting Agreement* with CCMI LLC setting forth the terms and conditions of the engagement and the portion of the fee that is due from the client prior to CCMI LLC commencing services.

FIRST STEP FINANCIAL PLANNING SERVICES

The fee for a First Step Financial Plan generally ranges from \$1,500 to \$2,500, and an initial retainer will be requested from the client before any work is performed for the client's benefit. The remainder of the fee will be billed upon completion of the plan. The fee includes time spent in a meeting with a CCMI LLC team member, reviewing the recommendations and possible alternative solutions and reviewing the completed planning work. The client may choose not to have a review meeting conducted; however, the balance of the financial planning fee will be billed at the completion of the plan.

Socially Responsible Investing Limitations. *Socially Responsible Investing* involves the incorporation of **Environmental, Social and Governance** considerations into the investment due diligence process (“ESG”). There are potential limitations associated with allocating a portion of an investment portfolio in ESG securities (i.e., securities that have a mandate to avoid, when possible, investments in such products as alcohol, tobacco, firearms, oil drilling, gambling, etc.). The number of these securities may be limited when compared to those that do not maintain such a mandate. ESG securities could underperform broad market indices. Investors must accept these limitations, including potential for underperformance. Correspondingly, the number of ESG mutual funds and exchange traded funds are few when compared to those that do not maintain such a mandate. As with any type of investment (including any investment and/or investment strategies recommended and/or undertaken by CCMI LLC), there can be no assurance that investment in ESG securities or funds will be profitable or prove successful.

Margin Accounts and Securities-Based Loans

A client who has a need to borrow money could determine to do so by using:

- **Margin**-The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money, and uses the assets in the client’s brokerage account as collateral or
- **Pledged Assets Loan**- In consideration for a lender (i.e., a bank, etc.) to make a loan to the client, the client pledges its investment assets held at the account custodian as collateral.

These above-described collateralized loans are generally utilized because they typically provide more favorable interest rates than standard commercial loans. These types of collateralized loans can assist with a pending home purchase, permit the retirement of more expensive debt, or enable borrowing in lieu of liquidating existing account positions and incurring capital gains taxes. However, such loans are not without potential material risk to the client’s investment assets. The lender (i.e. custodian, bank, etc.) will have recourse against the client’s investment assets in the event of loan default or if the assets fall below a certain level. For this reason, CCMI LLC does not recommend such borrowing unless it is for specific short-term purposes (i.e. a bridge loan to purchase a new residence). CCMI LLC does not recommend such borrowing for investment purposes (i.e. to invest borrowed funds in the market). Regardless, if the client was to determine to utilize margin or a pledged assets loan, the following economic benefits would inure to CCMI LLC:

- by taking the loan rather than liquidating assets in the client’s account, CCMI LLC continues to earn a fee on such Account assets; and,
- if the client invests any portion of the loan proceeds in an account to be managed by CCMI LLC, CCMI LLC will receive an advisory fee on the invested amount; and,
- if CCMI LLC’s advisory fee is based upon the higher margined account value (**see** margin disclosure at Item 5 below), CCMI LLC will earn a

correspondingly higher advisory fee. This could provide CCMI LLC with a disincentive to encourage the client to discontinue the use of margin.

Please Note: The Client must accept the above risks and potential corresponding consequences associated with the use of margin or a pledged assets loans.

- A. Clients may elect to have CCMI LLC's advisory fees deducted from their custodial account. Both CCMI LLC's *Investment Advisory Agreement* and the custodial/clearing agreement may authorize the custodian to debit the client's account(s) for the amount of CCMI LLC's investment advisory fee and to directly remit that management fee to CCMI LLC in compliance with regulatory procedures. In the limited event that CCMI LLC bills the client directly, payment is due upon receipt of CCMI LLC's invoice. CCMI LLC shall deduct fees and/or bill clients quarterly, in arrears, based upon the average daily market value of the assets on the last business day of the previous quarter. Oftentimes, clients own more than one account that are managed by CCMI LLC. In those cases, CCMI LLC may deduct its fee from any account under its management when determined necessary or appropriate. For example, CCMI LLC may not have authority to deduct its fee from certain accounts held at a custodian other than *Schwab* and may instead deduct all of its fees owed from an account held at *Schwab*.
- B. Unless the client directs otherwise or an individual client's circumstances require, CCMI LLC generally recommends that *Schwab* serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* charge brokerage commissions and transaction fees for effecting securities transactions (e.g. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition, client accounts may invest in mutual funds (including money market funds) and ETFs that have various internal fees and expenses (i.e. management fees), which are paid by these funds but ultimately borne by clients as a fund shareholder. These internal fees and expenses are in addition to the fees charged by CCMI LLC. Clients may also incur additional fees charged by Independent Managers as more fully described in Item 4 above.
- C. CCMI LLC's annual investment advisory fee shall be prorated and paid quarterly, in arrears, based upon the average daily market value of the assets of the portfolio during the previous quarter. If an independent manager is used, the investment management fees for the independent managers will be billed quarterly, either in advance of the quarter or in arrears, depending on the billing procedure of the independent manager. While CCMI LLC doesn't generally have a minimum annual fee, as noted above, we prefer working with households with more than \$500,000; however, depending on the relationship the client or their family has with the firm, smaller portfolios can be accommodated on a specialized basis.
- The *Investment Advisory Agreement* between CCMI LLC and the client will continue in effect until terminated by either party by written notice. Upon termination, CCMI LLC shall debit the account for the pro-rated portion of the unpaid advisory fee based upon the number of days that services were provided during the billing quarter.
- D. Neither CCMI LLC, nor its representatives accept compensation from the sale of

securities or other investment products. CCMI LLC is strictly a fee-only firm.

Item 6 Performance-Based Fees and Side-by-Side Management

CCMI LLC is not a party to any performance or incentive-related compensation arrangements with its clients.

Item 7 Types of Clients

CCMI LLC's clients generally include individuals, pension and profit sharing plans, business entities, trusts, and estates. Item 5 above contains additional information about CCMI LLC's minimum fees and account minimums. CCMI LLC shall generally price its advisory services based upon various objective and subjective factors. As a result, our clients could pay diverse fees based upon the type, amount and market value of their assets, the anticipated complexity of the engagement, the anticipated level and scope of the overall investment advisory services to be rendered. Additionally, CCMI LLC, in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts or households, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** Registrant's Chief Compliance Officer, Brian Matter, remains available to address any questions that a client or prospective client may have regarding advisory fees.

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

A. Methods of Analysis

At CCMI, we are guided by the following investment principles and beliefs:

1. Markets are efficient: Security prices reflect available information.
2. Structure determines performance: Asset allocation along with size, value and market exposure primarily determine the results of a broadly diversified portfolio.
3. Risk and return are related: Exposure to meaningful risk factors determines expected return.
4. Diversification is essential: Diversification reduces uncertainty; concentrated investments add risk with no additional expected return.
5. Costs and taxes matter: Expenses and taxes reduce net returns.

Recommendations for our purchases of investments are based on publicly available reports and analysis. We utilize many sources of public information including financial news and research materials. CCMI may utilize the following methods of security analysis:

- Fundamental - analysis performed on historical and present data, with the goal of making financial forecasts
- Technical – analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices

One of the prime basis of our investment approach is Modern Portfolio Theory. We also respect a variety of well-known studies focusing on efficient markets, the long-term performance histories of value stocks versus growth stocks, small capitalization stocks versus large capitalization stocks, and passive versus active management.

We objectively attempt to apply this historical and ongoing research to construct portfolios for relative and absolute performance. More importantly, each client's portfolio is designed to meet that client's stated objectives.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by CCMI LLC) will be profitable or equal any specific performance level(s). Investing in securities involves risk of loss that clients should be prepared to bear.

B. Investment Strategies

The investment advisors at CCMI LLC believe that investing is done for the long-term. However, every investment strategy has its own inherent risks and limitations. For example, longer-term investment strategies require a longer investment period to allow for the strategy to potentially develop. Shorter-term investment strategies require a shorter investment period to potentially develop but, because of more frequent trading, may incur higher transactional costs when compared to a longer-term investment strategy.

CCMI LLC may utilize the following investment strategies when implementing investment advice given to clients:

- Long-Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Periodically rebalancing a portfolio due to a major change in economic conditions or a change in asset classes selected by the CCMI advisors. Wide latitude is given to rebalancing, as taxes and transaction costs influence the decisions made.

CCMI LLC's methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis CCMI LLC must have access to current/new market information. CCMI LLC has no control over the dissemination rate of market information; therefore, unbeknownst to CCMI LLC, certain analyses may be compiled with outdated market information, severely limiting the value of CCMI LLC's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

C. Risk of Loss.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by CCMI) will be profitable or equal any specific performance level(s).

Our investment approach keeps the risk of loss in mind. Investors face several investment risks which include:

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry.
- **Cash Positions:** At any time and for a substantial length of time CCMI LLC may hold a significant portion of a client's assets in cash or money market mutual funds. Investments in these assets may cause a client to miss upswings in the markets. Although currently CCMI LLC is not billing for cash in money market accounts, at some future date, all cash and cash equivalents (money markets, etc.) can be included as part of assets under management for purposes of calculating CCMI LLC's advisory fee. A client can advise CCMI LLC not to maintain (or to limit the amount of) cash holdings in the client's account.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Interest Rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate.
- **Investment Company (including ETF) Risk:** Investments in investment companies, such as ETFs and mutual funds, involves the duplication or layering of advisory fees and certain other expenses. Investment company shareholders bear the fund's proportionate share of the fees and expenses in connection with the fund's own operations, and indirectly the fees and expenses of any underlying investment, which may include other investment companies. If the investment company or ETF fails to achieve its investment objective, the value of the fund's investment will decline, adversely affecting the fund's performance. In addition, ETF shares potentially may trade at a discount or a premium and are subject to brokerage and other trading costs, which could result in greater expenses to the fund. In addition, most mutual funds and ETFs are available directly to the public. You can obtain many of the mutual funds and ETFs used by CCMI LLC without engaging CCMI LLC. However, you will not receive CCMI LLC's initial and ongoing investment advisory services. Other mutual funds, such as those issued by Dimensional Fund Advisors ("DFA"), are generally only available through registered investment advisers. CCMI LLC may invest in DFA mutual funds. If a client terminates CCMI LLC, restrictions regarding the transfer and additional purchase of, or reallocation among DFA funds will apply. Clients selling their DFA mutual funds may be subject to tax consequences.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in

a standardized product.

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances.
- **Portfolio Inactivity:** CCMI LLC reviews client portfolios on a quarterly basis as described in greater detail in Item 13 below. Depending on the results of those reviews, CCMI may determine that changes to a client's portfolio is unnecessary. CCMI will continue to charge its advisory fees described in Item 5 above regardless of the level of trading in the client's account.
- **REITs:** REITs are subject to risks generally associated with investing in real estate, such as: possible declines in the value of real estate; adverse general and local economic conditions; possible lack of availability of mortgage funds; changes in interest rates; and environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.
- **Reinvestment Risk:** This is the risk that future proceeds from investments – primarily fixed income securities – may have to be reinvested at a potentially lower rate of return (i.e. interest rate).

Item 9 Disciplinary Information

CCMI LLC has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

- A. Neither CCMI LLC, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither CCMI LLC, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. CCMI LLC has no other relationship or arrangement with a related person that is material to its advisory business.
- D. CCMI LLC does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients. CCMI receives fees only from its clients.

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

- A. CCMI LLC has a fiduciary obligation to place our clients' interests above those of the advisory firm and disclose instances where it might be conflicted. CCMI LLC maintains a Policies and Procedures manual which contains an overall Code of Ethics, which serves to establish a standard of business conduct for all of CCMI LLC's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, CCMI LLC also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by CCMI LLC or any person associated with CCMI LLC.

- B. Neither CCMI LLC nor any related person of CCMI LLC recommends, buys, or sells for client accounts, securities in which CCMI LLC or any related person of CCMI LLC has a material financial interest.
- C. CCMI LLC and/or representatives of CCMI may buy or sell securities that are also recommended to clients. This practice may create a situation where CCMI LLC and/or representatives of CCMI are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if CCMI LLC did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of CCMI LLC's clients) and other potentially abusive practices.

CCMI LLC has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of CCMI LLC's "Access Persons". CCMI LLC's securities transaction policy requires that an Access Person of CCMI LLC must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, the Chief Compliance Officer will generate a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date CCMI LLC selects.

- D. CCMI and/or representatives of CCMI LLC may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice may create a situation where CCMI LLC and/or representatives of CCMI LLC are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11 C, CCMI LLC has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of CCMI LLC's Access Persons.

Item 12 Brokerage Practices

- A. In the event that the client requests that CCMI LLC recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct or recommend CCMI to use a specific broker-dealer/custodian), CCMI LLC generally that investment management accounts be maintained at Schwab. Prior to engaging CCMI LLC to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with CCMI setting forth the terms and conditions under which CCMI shall manage the client's assets, and a separate custodial/clearing agreement with each

designated broker-dealer/custodian.

Factors that CCMI LLC considers in recommending *Schwab* (or any other broker-dealer/custodian to clients) include historical relationship with CCMI LLC, financial strength, reputation, execution capabilities, pricing, research, and service. Broker-dealers such as Schwab can charge transaction fees for effecting certain securities transactions (**See** Item 4 above). To the extent that a transaction fee will be payable by the client to Schwab, the transaction fee shall be in addition to CCMI LLC's investment advisory fee referenced in Item 5 above. .

To the extent that a transaction fee is payable, CCMI LLC shall have a duty to obtain best execution for such transaction. However, that does not mean that the client will not pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where CCMI LLC determines, in good faith, that the transaction fee is reasonable. 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, transaction rates, and responsiveness. Accordingly, although CCMI LLC will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions.

1. Non-Soft Dollar Research and Additional Benefits

CCMI LLC receives from Schwab (and potentially other broker-dealers, custodians, investment platforms, unaffiliated investment managers, vendors, or fund sponsors) free or discounted support services and products. Certain of these products and services assist CCMI LLC to better monitor and service client accounts maintained at these institutions. The support services that CCMI LLC obtains can include investment-related research; pricing information and market data; compliance or practice management-related publications; discounted or free attendance at conferences, educational or social events; or other products used by CCMI LLC to further its investment management business operations.

CCMI LLC's clients do not pay more for investment transactions executed or assets maintained at Schwab or other broker-dealers and custodians because of these arrangements. There is no corresponding commitment made by CCMI LLC to any broker-dealer or custodian or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products because of the above arrangements.

CCMI LLC's Chief Compliance Officer, Brian Matter, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.

2. CCMI LLC does not receive referrals from broker-dealers.
3. CCMI LLC recommends that its clients utilize the brokerage and custodial services provided by Schwab. The Firm generally does not accept directed brokerage arrangements (but could make exceptions). A directed brokerage arrangement arises when a client requires that account transactions be effected through a specific broker-dealer/custodian, other than one generally

recommended by CCMI LLC (i.e., Schwab). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Firm will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by CCMI LLC. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

In the event that the client directs CCMI LLC to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through CCMI LLC.

Higher transaction costs adversely impact account performance. Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

CCMI's Chief Compliance Officer, Brian Matter, remains available to address any questions that a client or prospective client may have regarding the above arrangement.

- B. Transactions for each client account generally will be effected independently unless Firm decides to purchase or sell the same securities for several clients at approximately the same time. The Firm may (but is not obligated to) combine or "batch" such orders for individual equity transactions (including ETFs) with the intention to obtain better price execution, to negotiate more favorable commission rates, or to allocate more equitably among the Firm's clients differences in prices and commissions or other transaction costs that might have occurred had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. CCMI LLC does not receive any additional payments as a result of any order aggregation.

Item 13 Review of Accounts

- A. For those clients to whom CCMI LLC provides investment supervisory services, account reviews are conducted periodically by CCMI LLC's Managing Members and/or representatives. CCMI generally reviews accounts for rebalancing on a quarterly basis but may adjust the timing depending on the portfolios structure or client needs. All investment supervisory clients are advised that it remains their responsibility to advise CCMI LLC of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with CCMI LLC on an annual basis.
- B. CCMI LLC may conduct additional account reviews within other time frames, because of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

- C. Clients are provided, monthly or quarterly statements with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. CCMI LLC also provides a written periodic report summarizing account activity and performance.

Item 14 Client Referrals and Other Compensation

- A. As referenced in Item 12 above, CCMI LLC may receive indirect economic benefit from Schwab or other fund companies.
- B. Neither CCMI LLC nor its representatives compensate non-supervised persons for client referrals or solicitation of client referrals. At CCMI LLCs discretion, a charitable gift of up to \$50 may be made directly to a charity in honor of a referral source, one time per referral. This is done as a thank you for the referral, and the non-supervised person does not receive any direct benefit from the charitable donation.

Item 15 Custody

CCMI LLC shall have the ability to have its advisory fee for each client debited by the custodian. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. CCMI LLC may also provide a written periodic report summarizing account activity and performance.

Clients are urged to compare reports provided by CCMI LLC with the account statements received from the account custodian. The account custodian does not verify the accuracy of CCMI LLC's advisory fee calculation.

CCMI LLC may also be deemed to have custody of certain non-Schwab client accounts because of the services it provides to these accounts. CCMI LLC maintains usernames and passwords of certain "held away" accounts to advise clients regarding these holdings. The client accounts for which CCMI LLC is deemed to have custody are subjected to an annual, independent verification in accordance with Rule 206(4)-2 under the Investment Advisers Act of 1940.

Item 16 Investment Discretion

The client can determine to engage CCMI LLC to provide investment advisory services on a discretionary basis. Prior to CCMI LLC assuming discretionary authority over a client's account, the client shall be required to execute an *Investment Advisory Agreement*, naming CCMI LLC as the client's attorney and agent in fact, granting CCMI LLC full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage CCMI LLC on a discretionary basis may, at any time, impose restrictions, in writing, on CCMI LLC's discretionary authority (i.e. limit the types/amounts of securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe

CCMILLC's use of margin, etc.).

 **Item 17 Voting Client Securities**

- A. CCMILLC does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.
- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact CCMILLC to discuss any questions they may have with a particular solicitation.

 **Item 18 Financial Information**

- A. CCMILLC does not solicit fees of more than \$1,200, per client, six months or more in advance of providing services.
- B. CCMILLC is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. CCMILLC has not been the subject of a bankruptcy petition.

ANY QUESTIONS: CCMILLC's Chief Compliance Officer, Brian Matter, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.

Matt is a member of the national and local chapters of the Financial Planning Association and the National Association of Personal Financial Advisors. Matt also serves on the board of the Estate Planning Council of San Diego, the Scripps Health Foundation Gift Planning Advisory Board, and a board member at Junior Achievement San Diego. Matt previously served as a founding board member of Empower Language Academy Charter School in San Diego. Additionally, Matt is a graduate of LEAD San Diego's IMPACT program (2013).

In the past, Matt has spent time volunteering with Junior Achievement, March of Dimes, I Love a Clean San Diego and the San Diego Food Bank. In his spare time, he enjoys playing volleyball, golf, and relaxing with his wife, Alex. Together, Matt and Alex like to travel, cook, and spend time with their two young children, Elizabeth and Jacob.

Disciplinary Information:

None

Other Professional Activities:

Financial Planning Association National and San Diego Chapters (Member), National Association of Personal Financial Advisors (Member), Estate Planning Council of San Diego (Past-President), Junior Achievement San Diego (Board Member), LEAD San Diego Graduate, Vistage (Member)

Additional Compensation:

Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI, its principals, and employees. No commissions or additional compensation of any kind is generated or accepted.

Supervision:

Matthew Showley is supervised by Brian Matter.

Matthew Showley's Contact Information:

(619) 298-3993 x101 matt@myccmi.com

 **Brian W. Matter, CFP[®], CPWA[®], CEPA, Principal**

Educational Background:

Brian was born in 1979. He attended Brigham Young University and graduated with a Bachelor of Science in Business Management in 2001. Brian also completed the CFP[®] Certification Professional Education Program from the College for Financial Planning in 2009. Brian successfully completed the CERTIFIED FINANCIAL PLANNER[™] curriculum and passed the comprehensive examination in March 2010, prior to joining CCMI in June of 2010. Brian received his CFP[®] designation in September of 2012. Brian successfully completed the Certified Private Wealth Advisor[®] program through the Yale School of Management, passed the comprehensive examination, and received the CPWA[®] designation in June 2020. Brian completed the Certified Exit Planning Advisor program through the Exit Planning Institute and passed the comprehensive examination to receive the CEPA designation in January 2021.

Business Experience:

Prior to joining CCMI LLC's predecessor (CCMI), Brian spent eight years at a "Big

Four” public accounting firm, Ernst & Young. Brian achieved the rank of Senior Manager in the Advisory Services group and helped to manage a team in the San Diego office which served clients ranging from small start-ups to Fortune 500 corporations in a variety of industries.

He is a member of the national and local chapters of the Financial Planning Association and a member of National Association of Personal Financial Advisors. Brian actively works with clients in both the financial planning and investment management services.

In his spare time, Brian enjoys spending time with his wife Nikki, his daughter Emma, and his sons Kainoa and Kekoa. He also enjoys traveling the world, volunteering, surfing and competing in sports.

Disciplinary Information:

None

Other Professional Activities:

Financial Planning Association National and San Diego Chapters (Member), BYU Management Society San Diego Chapter (Board member); San Diego Downtown Breakfast Rotary Club; San Diego Downtown Breakfast Rotary Foundation (Board Member); National Association of Personal Financial Advisors (Member); LEAD San Diego Graduate (2014); Entrepreneur’s Organization (Member); Investments and Wealth Institute (Member); Exit Planning Institute (Member)

Additional Compensation:

Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI, its principals, and employees. No commissions or additional compensation of any kind is generated or accepted.

Supervision:

Brian Matter is supervised by Matthew Showley.

Brian Matter’s Contact Information:

(619) 298-3993 x102 brian@myccmi.com

 **Kimberly M. Benson “Kim”, CFP®, CPA, CeFT®, Lead Advisor**

Educational Background:

Kim was born in 1978. She attended Bryant University and graduated with a Bachelor of Science in Business Administration in Accounting with a minor in Legal Studies in 2001. She later obtained a Certificate in Financial Planning in 2017 through Bryant University’s online program. Kim successfully completed the CERTIFIED FINANCIAL PLANNER™ curriculum and passed the comprehensive examination in March 2017, after joining CCMI in November of 2015. Kim received her CFP® designation in October of 2017. Kim completed the Certified Financial Transitionist (CeFT®) program and passed the test to become a CeFT® in 2022.

Business Experience:

Prior to joining CCMI LLC’s predecessor (CCMI), Kim spent 12 years of her career at United Technologies where she held roles of increasing responsibility within corporate

finance, including a 2-year international assignment near Paris, France. Prior to this, Kim began her career at a “Big Four” public accounting firm, PricewaterhouseCoopers and served clients in the Commercial and Industrial Products and Services practice in the Boston, MA and Charlotte, NC areas. Kim is also a Certified Public Accountant (CPA).

Kim joined CCMI, the predecessor firm to CCMI LLC in 2015 as a Financial Planning Associate. Kim actively works with clients in both financial planning and investment management services. She is a member of the national and local chapters of the Financial Planning Association (FPA) and a member of the American Institute of Certified Public Accountants (AICPA).

Kim grew up in Maine and in her spare time she enjoys outdoor activities including biking, hiking and skiing. Kim enjoys spending time with her husband Tyler and together they like to cook, travel, visit with family and friends, enjoy the outdoors and relax at home with their dog.

Disciplinary Information:

None

Other Professional Activities:

Financial Planning Association National and San Diego Chapters (Member), Bryant University Alumni Association (Member); National Association of Personal Financial Advisors (Member); Women in Business San Diego Chapter (Past-President and Membership Co-Chair 2021-2022), American Institute of Certified Public Accountants (Member), LEAD Impact San Diego Graduate (2019), Financial Transitionist Institute (Member), Estate Planning Council of San Diego (Member).

Additional Compensation:

Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI, its principals, and employees. No commissions or additional compensation of any kind is generated or accepted.

Supervision:

Kim Benson is supervised by Brian Matter.

Kim Benson's Contact Information:

(619) 298-3993 x103 kim@myccmi.com

 **Tina M. Vieregg, CFP[®], BFA[™]**

Educational Background:

Tina was born in 1969. She attended Kent State University and graduated with a Bachelor of Arts in Business Administration with a concentration in Finance in 1991. She later obtained a graduate certificate in Financial and Tax Planning from San Diego State University in 2019. Tina earned her CERTIFIED FINANCIAL PLANNER[™] designation in March 2019 and her Behavior Financial Advisor (BFA[™]) designation in March 2020.

Business Experience:

Prior to joining CCMI, LLC, Tina spent three years as a Financial Advisor with Seaside

Wealth Management in San Diego where she created and presented personalized financial plans and managed the investment portfolios for her clients. Before passing her CFP®, Tina worked at eMoney Advisor, a leading financial technology company where she assisted other Financial Advisors in preparing complex financial plans using the firm's software.

Tina began her career as a registered representative with Morgan Stanley. Later, she joined an Independent RIA where she was a member of the Investment Committee. Tina was instrumental in administering the due diligence efforts for the investment products that were used in client portfolios and assisted in setting investment policy for client accounts.

Tina grew up in Ohio and moved to San Diego in 2007. Tina and her husband Dave have two daughters and they enjoy spending time together as a family. They are members of San Diego Yacht Club where they spend as much time on the water as possible and are involved in sailboat racing.

Disciplinary Information:

None

Other Professional Activities:

Financial Planning Association National and San Diego Chapters (Member), National Association of Personal Financial Advisors (Member) and is a past volunteer for Junior Achievement of San Diego.

Additional Compensation:

Only client fees, regardless of whether the client pays an hourly fee or a quarterly portfolio advisory fee, compensate CCMI, its principals, and employees. No commissions or additional compensation of any kind is generated or accepted.

Supervision:

Tina Vieregg is supervised by Matt Showley and Brian Matter

Tina Vieregg's Contact Information:

(619) 298-3993 x112 tina@myccmi.com
