

# Conscious Capital Management LLC Firm Brochure

*This brochure provides information about the qualifications and business practices of Conscious Capital Management LLC. If you have any questions about the contents of this brochure, please contact us at (608) 843-6377 or by email at: [brian@ccminvestment.com](mailto:brian@ccminvestment.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 Conscious Capital Management LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Conscious Capital Management LLC's CRD number is: 156550*

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*Registration does not imply a certain level of skill or training.*

Version Date: 01/19/2022

## **Item 2: Material Changes**

There are no material changes in this brochure from the last annual updating amendment of Conscious Capital Management LLC on May 20th, 2016. Material changes relate to Conscious Capital Management LLC's policies, practices or conflicts of interests only.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

This firm has been in business since January 22, 2011, and the principal owner is Brian Alexander Bengry.

### B. Types of Advisory Services

Conscious Capital Management LLC (hereinafter "CCM") offers the following services to advisory clients:

#### Investment Supervisory Services

CCM offers multiple ongoing portfolio advisory & management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. CCM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, net worth, investing experience, tax rates, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

CCM may evaluate the current investments of each client with respect to their risk tolerance levels and time horizon. In some services, CCM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. CCM also uses a proprietary system of evaluation for asset allocation recommendations, and preference recommendations (ex: ethical investing recommendations). CCM offers both Personalized Advisory Services and Simple Investing Services (Optimal & Ethical Investing Portfolios) which are further described below. **There is no assurance that any strategy will be successful in achieving its stated goals. All investments have a potential for principal loss. Past performance does not guarantee future results.**

#### **Personal Advisory Services:**

**Description:** Personal advisory service is our comprehensive financial planning & investment management service. Clients can give either discretionary or non-discretionary authorization to CCM for investment management. Clients will work with a dedicated financial professional and receive quarterly reviews, consultations, comprehensive financial planning, and portfolio management for an annual fee on the assets under the advisory service. This fee is deducted on a quarterly basis. Investment

strategies can be tailored to specific financial needs & objectives as listed in their investment policy and may use a variety of different investment types which typically can include but are not limited to: Individual securities (individual stocks & bonds), mutual funds, Exchange Traded Funds (ETF's), CD's, cash instruments, & options. Sustainable alternatives such as community investment funds, microfinance funds, private funds, or other alternative investments may be reviewed and considered as part of an advised portfolio at client's request. Many alternative investments may have additional requirements such as accreditation. CCM may not directly manage, have access to all information, or see activity in sustainable alternative investments and therefore be limited in advising on such investments. The prospectus, risks, offering, and other important information must be reviewed before investing in such investments and periodically thereafter and will be at the sole responsibility of the client should they choose to invest in such an investment. CCM may advise how to include such investment into their portfolio strategy and acting in good faith, shall not be liable for any action, omission, investment recommendation/decision, or loss in connection with such investments. **These alternative investments can have greater risk of loss of principle and you, the client, should be prepared to bear such a risk if choosing to include such investments.** This broader selection of investment choices in this service allows for us to help better meet client's financial needs, investment objectives, personal preferences, and risk parameters as outlined in their investment policy.

CCM may apply fundamental investing and financial principles supported by academic studies and research data proven to support performance over time. This investment management approach may include investing principles such as modern portfolio efficiency theory, global diversification, and passive or active investing styles. It may also include financial strategies such as dollar cost averaging, dividend reinvesting, regular rebalancing, tax loss harvesting, tax efficient investing, and cash flow automation considered to contribute additional value to managing the portfolio. Other principles or strategies considered useful may also be applied. Important factors such as client suitability, current economic & market cycles, and feasibility of applying some principles or strategies may be considered before applying them to a particular portfolio. If discretionary authority is given to CCM, CCM will regularly monitor and assess the portfolios for performance and may buy or sell specific investments on behalf of the client without prior permission. Changes made in the portfolio can occur for many reasons but some common examples would be to adjust for important changes in the investment policy, economic and market conditions, investment changes, client withdrawals or deposits, rebalancing, tax loss harvesting, and fee withdrawals.

**Services:** Personal Advisory service is best suited for clients desiring a dedicated financial advisor with financial planning and investment management under one service. Clients selecting this service typically want or need more involvement with their portfolio, broader investment choices, and regular financial guidance to reach their objectives. This service includes quarterly portfolio reviews, annual financial planning updates, and clients can request additional consultations with their advisor as needed. CCM will assist with various financial and investment needs as listed in the investment advisory contract. Account related questions and services will be available through the

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custodian listed in the investment advisory contract. The custodian will also provide the account statements, tax report documents, and can assist with other account services. CCM will send out portfolio reports quarterly that will include important portfolio review, performance, and billing information.

### **Simple Investing Services: Optimal & Ethical Investing Portfolios**

**Description:** Simple Investing Services offers two different options: Optimal Investing or Ethical Investing Portfolios. Both options are discretionary investment management services designed to provide clients with simple, accessible, professional financial help, and portfolio management with lower investment minimums and lower management fees. These portfolios are globally diversified across different asset classes and recommended in a manner suitable for the client's financial needs, investment objectives, and risk parameters as outlined in their investment policy. CCM may apply fundamental investing and financial principles supported by academic studies and research data proven to support performance over time. This investment management approach may include investing principles such as modern portfolio efficiency theory, global diversification, and a passive investing style. It may also include financial strategies such as dollar cost averaging, dividend reinvesting, regular rebalancing, tax loss harvesting, tax efficient investing, and cash flow automation considered to contribute additional value to managing the portfolio. Other principles or strategies considered useful may also be applied. Important factors such as client suitability, current economic & market cycles, and feasibility of applying some principles or strategies may be considered before applying them to a particular portfolio. CCM will regularly monitor and assess the portfolios for performance which may initiate a buy or sell of specific investments and CCM may make changes to the portfolios at their discretion. Changes made in the portfolio can occur for many reasons but some common examples would be to adjust for important changes in the investment policy, economic and market conditions, investment changes, client withdrawals or deposits, rebalancing, tax loss harvesting, and fee withdrawals. These portfolios can be used in a financial goal based approach where different portfolios may apply to different goals. CCM may advise a client to use multiple portfolios for different goals and financial needs.

**Services:** These services are best suited for clients desiring a discretionary or full professional investment management service with low involvement, lower management fees and lower investment minimums. Clients who choose this service typically prefer discretionary portfolio management and do not want to be involved in the day to day decision making of their investment portfolios. They do not want regular consultations or in person quarterly meetings with a financial professional. However, this service does include an initial in person consultation to help assure a thorough understanding of a client's financial objectives, needs, personal preferences, and risk tolerance. As well as assist the client in accurate completion of the following important new client processes. During the initial consultation a CCM financial professional will work with the client to

verify information, suitability, and investment policy development. Assist with completing paperwork, opening accounts, depositing funds, or transferring assets. Set up additional services such as automatic contributions, electronic transfer capabilities, and other preferential services to support accuracy and a positive client experience. This service will also offer the client an annual in person review & consultation with an experienced financial professional generally around their anniversary date of the investment advisory contract. This annual review & consultation provides the opportunity for the client to review their financial situation, objectives, needs, risk tolerance and other factors important to keeping their investment policy current and verify continued investment suitability. During this annual consultation the client can receive a review of their investment portfolio, a financial goal analysis to track their progress and discuss other financial changes or consultative needs with an experienced financial professional. No other quarterly meetings or regular consultations will typically be provided with this service. This reduced advisory time allows us to offer this service at a lower management and advisory fee pricing schedule. Clients who need or prefer more consultations or personal meetings may be referred to our personal advisory service. The CCM office will be available for simple investing service & investment related questions in between annual consultations. Account related questions and service needs will be available through the custodian TD Ameritrade or Charles Schwab. TD Ameritrade or Charles Schwab will also provide the account statements, tax report documents, and can assist with other account services. CCM will send out portfolio reports quarterly that will include important portfolio review, performance, and billing information.

**Optimal Investing Portfolios:** Invests in index based, Exchange Traded Funds (ETF's)

**Ethical Investing Portfolios:** Invests in ethical, sustainable, socially responsible/conscious, or Environment, Social, & Governance (ESG) measured mutual funds or Exchange Traded Funds (ETF's).

### ***Ethical Retirement Plan Consulting Services***

#### **Description:**

CCM acting as a 3(38) ERISA Fiduciary offers ongoing consulting & investment management services to small business and small organization pension or other participant retirement benefit plans, including but not limited to Simple IRA's, SEP's, Individual 401(k)s, Profit Sharing Plan (PSP), Money Purchase Pension Plans (MPPP's) and other small retirement plans. All retirement plans provided through CCM will use the ethical investing portfolios for investment management services and follow their fee structure in whereas the plan participants are charged the management fee and the sponsor (employer) is charged the advisory fee. Additional planning services may include but are not limited to sponsor consultations, participant education, enrollment, annual participant financial review & consultations. CCM provides investment retirement plans for organizations, foundations, endowments, businesses, & Institutions

based on the demographics, goals, objectives, time horizon, and/or risk tolerance of the plan's participant as outlined in each participant's investment policy.

**Service:**

This service is best suited for sponsors (employers) desiring consultation on establishing a retirement plan benefit and ethical portfolio management for their employees that participate in the plan. Service includes consulting sponsors on different plan options, educating & enrolling participants, annual participant financial reviews & consultations and discretionary portfolio management for all participants. During enrollment, a CCM financial professional will work with participants to verify correct information, suitability, and investment policy development. Assist with completing paperwork, opening accounts, depositing funds, or transferring assets. Set up additional services such as automatic contributions, electronic transfer capabilities, and other preferential services to support accuracy and a positive participant experience. The participant annual review & consultation provides the opportunity for each participant to review their financial situation, objectives, needs, risk tolerance and other factors important to keeping their investment policy current and verify continued investment suitability. During this annual consultation the participant can receive a review of their investment portfolio, a retirement analysis to track their progress, and discuss other financial changes or consultative needs with an experienced financial professional. This service offers cost sharing between the sponsor and participant where the sponsor pays the annual advisory fee per account and the participants pay the annual management fee. Whereas the annual management fee is deducted from each participating account quarterly and the advisory fee is billed to the sponsor each quarter. All retirement plans are managed with our ethical investing portfolios for each participant. These portfolios consist of Ethical, Sustainable, Socially Responsible/Conscious, or Environment, Social, & Governance (ESG) measured mutual funds that are globally diversified across different asset classes and recommended in a manner suitable for the participant's financial needs, investment objectives, and risk parameters as outlined in their investment policy. When an ethical fund is not available or suitable, another non-ethically measured fund may be used as a substitute to best meet portfolio needs and client goals. More specific ethical funds may include but are not limited to women's leadership, community building, environmental stewardship, social equality, and ethical governance policies & practices. The CCM office will be available for ethical retirement plan service & investment related questions in between annual consultations. Account related questions and service needs will be available through the custodian TD Ameritrade. TD Ameritrade will also provide the account statements, tax report documents, and can assist with other account services. CCM will send out portfolio reports quarterly that will include important portfolio review, performance, and billing information.

### ***Financial Planning***

Services are tailored to each client based on a number of factors including but limited to: Financial goals & objectives, investor characteristics such as age, marital status, dependents, knowledge basis, income & tax status, lifestyle, debt & budget, and investment preferences (ethical investments).

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; debt/credit planning; asset allocation recommendations, and preference recommendation (ethical investing recommendations) as show on Exhibit I of the Financial Planning Agreement. A formalized printout of such recommendations and implementation steps or an action plan will be given to the client. Referrals may be made to outside parties such as attorneys or tax professionals for specific legal and tax expertise. These services are based on hourly fees and the final fee structure is documented in Exhibit III of the Financial Planning Agreement.

### ***Services Limited to Specific Types of Investments***

CCM limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, options, ETFs, third party money managers, REITs, insurance products including annuities, and government securities. CCM may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

CCM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, net worth, investment experience, tax levels, and risk tolerance) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CCM from properly servicing the client account, or if the restrictions would require CCM to deviate from its standard suite of services, CCM reserves the right to end the relationship.

### **D. Wrap Fee Programs**

CCM does not participate in any wrap fee programs.

## E. Amounts Under Management

CCM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 17,477,239.71	\$ 0.00	12/31/2021

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Personal Advisory Services Fees*

**Minimum Accumulative Advisory Asset Value Required:** \$250,000.00

Discretionary Accounts:

Pricing Tier-Assets Under Management	Annual Fee
\$1 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.75%
\$3,000,001 and Above	0.50%

Nondiscretionary Accounts:

Pricing Tier-Assets Under Management	Annual Fee
\$1 - \$1,000,000	1.10%
\$1,000,001 - \$3,000,000	0.85%
\$3,000,001 and Above	0.60%

Fees for discretionary and non-discretionary accounts are negotiable. The final fee schedule is attached as Exhibit II of the Investment Advisory Contracts. Fees are paid quarterly in arrears, and clients may terminate their contracts with thirty days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. CCM fees are prorated to date of termination. CCM fees are withdrawn directly from the client's accounts with client written authorization. No commissions or trading fees will be charged by CCM. Commissions, transaction fees, and/or other trading costs charged to the client by the custodian may be

reimbursed by CCM at their discretion. Other fees may apply from the investments themselves or the custodian (Ex: TD Ameritrade or Charles Schwab) for other transactions, account services or functions or other charges unknown to CCM.

There is a minimum accumulative advising value on all assets equal to \$250,000 for the service listed above.

***Simple Investing Services: (Optimal & Ethical Investing Portfolios) Fees:***

**Minimum Investment Required: \$10,000.00**

**Fee Pricing Tier:**

<b>Pricing Tier-Assets Under Management</b>	<b>Annual Mgmt. Fee</b>	<b>Annual Advisory Fee</b>
\$10,000 - \$500,000	0.50%	\$250.00
\$500,000 - \$1,000,000	0.45%	\$250.00
\$1,000,001 and Above	0.40%	\$250.00

The annual management fee above + the annual advisory fee of \$250.00 is the total fee charged to the client by CCM. CCM fees are charged in arrears and quarterly. No commissions or trading fees will be charged by CCM. If the custodian (TD Ameritrade) or investment charges a commission or transaction fee, CCM will review the circumstances and may reimburse the costs to client at their discretion on the following quarterly bill. Other fees may apply from the investments themselves or the custodian TD Ameritrade for other transactions, account services or functions or other charges unknown to CCM.

CCM fees in Simple Investing Services (Optimal or Ethical Investing Portfolios) are generally not negotiable. CCM fees are paid quarterly in arrears, and clients may terminate their contracts with thirty days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. CCM Fees are prorated to date of termination. CCM fees are withdrawn directly from the client's accounts with client written authorization.

There is a minimum account value equal to \$10,000 for the service listed above.

## ***Ethical Retirement Plan Consulting Service Fees***

### Ethical Retirement Plan Consulting Pricing Tier:

<b>Pricing Tier-Assets Under Management</b>	<b>Annual Mgmt. Fee</b>	<b>Annual Advisory Fee</b>
\$10,000 - \$500,000	0.50%	\$250.00
\$500,000 - \$1,000,000	0.45%	\$250.00
\$1,000,001 and Above	0.40%	\$250.00

The annual management fee above is charged to each plan participant's account and is withdrawn quarterly with written authorization. The annual advisory fee of \$250.00 is charged to the sponsor (employer) for each plan participant's account as a flat annual minimum fee billed quarterly in arrears for payment by check. Together this blended cost sharing arrangement is the total fee charged by CCM. CCM fees are charged in arrears and quarterly. No commissions or trading fees will be charged by CCM. If the custodian (TD Ameritrade) or investment charges a commission or transaction fee, CCM will review the circumstances and may reimburse the costs to client at their discretion on the following quarterly bill. Other fees may apply from the investments themselves or the custodian TD Ameritrade for other transactions, account services or functions or other charges unknown to CCM.

CCM fees in the Ethical Retirement Plan Consulting Service are generally not negotiable. CCM fees are paid quarterly in arrears, and clients may terminate their contracts with thirty days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. CCM fees are prorated to date of termination. CCM fees are withdrawn directly from the client's accounts with client written authorization.

## ***Financial Planning Fees***

### ***Hourly Fees***

Depending upon the complexity of the situation and the needs of the client, the negotiated hourly fee for these services is typically between \$150-\$300 per hour. The fees are negotiable, and the final fee schedule will be attached as Exhibit III of the Financial Planning Agreement. Based on considerations of the services agreed to, current available information, hourly fee, and hourly work required to complete service, client and IA will agree to an estimated number of hours and cost for this service. Hourly fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan. Fee is payable 50% upon acceptance of Agreement and 50% upon completion of the engagement deliverables. The Advisor shall not collect fees of \$500 or more for any services that will be provided six (6)

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months or more in advance. Clients may terminate their contracts or cancel their financial planning service without penalty within five business days of signing the advisory contract for a full refund. An amendment can be made, if required, by an updated agreement and mutual consent executed by both parties. Fees are paid by check.

## **B. Payment of Fees**

### ***Payment of Investment Supervisory Fees***

Annual management fees for personal advisory services or simple investing services (optimal or ethical investing portfolios) including the advisory fee are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in arrears.

### ***Payment of Retirement Plan Consulting Services Fees***

Investment annual management fees are withdrawn directly from the plan participant's accounts with participant's written authorization. Fees are paid quarterly in arrears.

Retirement plan advisory fees are paid by the plan sponsor (employer), each quarter, by check.

### ***Payment of Financial Planning Fees***

Hourly Financial Planning fees are paid via check. Hourly fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan. Fee is payable 50% upon acceptance of Agreement and 50% upon completion of the engagement deliverables. The Advisor shall not collect fees of \$500 or more for any services that will be provided six (6) months or more in advance. Clients may terminate their contracts or cancel their financial planning service without penalty within five business days of signing the advisory contract for a full refund. An amendment can be made, if required, by an updated agreement and mutual consent executed by both parties.

## **C. Clients Are Responsible For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CCM. CCM may reimburse certain fees (such as commissions or transaction fees) at their discretion. Please see Item 12 of this brochure regarding broker/custodian.

## **D. Prepayment of Fees**

CCM collects fees in advance and in arrears. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees charged in arrears will be prorated to termination of advisory relationship. Advanced fees will be returned within fourteen days to the client via check or return to credit card.

## **E. Outside Compensation For the Sale of Securities to Clients**

Neither CCM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

CCM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

CCM generally provides investment advice and/or management supervisory services to the following Types of Clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Retirement Plan, Pension and Profit Sharing Plans
- ❖ Charitable Organizations
- ❖ Small Businesses and Non-Profits

### ***Minimum Account Size***

For the personal advisory services there is a minimum accumulative advising value on all assets under service of \$250,000.

For simple investing services (optimal or ethical investing portfolios), there is a minimum account value equal to \$10,000.

For financial planning & retirement plan consulting services there is no account minimum.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

CCM's methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis, and macro and micro analysis.

*Charting analysis* involves the use of patterns in performance charts. CCM uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

*Fundamental analysis* involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

*Technical analysis* involves the analysis of past market data; primarily price and volume.

*Cyclical analysis* involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

*Macro & Micro Economic Analysis* involves the monitoring and analysis of economic trends, cycles and significant patterns used to help predict economic and capital market conditions and direction.

CCM also uses third party information and a proprietary method of evaluation for ethical investments.

#### *Investment Strategies*

CCM uses long term trading, short term trading, short sales, margin transactions, options writing (including covered options, uncovered options, or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

#### *Methods of Analysis*

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

*Fundamental analysis* concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

*Technical analysis* attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

*Cyclical analysis* assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

### ***Investment Strategies***

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a chance of material risk of loss using any of those strategies.

CCM uses some leveraged and bear market investments such as ETFs and mutual funds in small percentages to increase opportunities in market trends and maintain a high level of diversification.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

CCM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize short sales, margin transactions, and options writing in specific situations and as suitable for the client. These types of investments may require additional approval to assure suitability for the client. Short sales, margin transactions, and options writing generally hold greater risk of capital loss and clients should be aware that there is a chance of material risk of loss using any of those strategies.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

In August 2008, while at JP Morgan Chase, a client alleges misrepresentation relating to the liquidity of an auction rate security purchased by Brian Alexander Bengry. JP Morgan Chase agreement to a settlement whereby the firm would buy back at par, the auction rate securities in addition to paying accrued interest on the par amount. Additional information is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither CCM nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither CCM nor its representatives are registered as a FCM, CPO, or CTA.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Neither CCM nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

### **D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections**

CCM will not direct clients to third party money managers.

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

### **A. Code of Ethics**

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Clients may request a copy of our Code of Ethics from management.

## **B. Recommendations Involving Material Financial Interests**

CCM does not recommend that clients buy or sell any security in which a related person to CCM has a material financial interest.

## **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of CCM may buy or sell securities for themselves that they also recommend to clients. CCM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

## **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of CCM may buy or sell securities for themselves at or around the same time as clients. CCM will not trade non-mutual fund or non-ETF securities 5 days prior to or 5 days after trading the same security for clients.

# **Item 12: Brokerage Practices**

## **A. Factors Used to Select Custodians and/or Broker/Dealers**

The Custodian, TD AMERITRADE Institutional, Division of TD AMERITRADE, Inc., member FINRA/SIPC/NFA, was chosen based on their relatively low transaction fees and access to multiple investment types. CCM will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

### ***1. Research and Other Soft-Dollar Benefits***

CCM receives no research, product, or service other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

### ***2. Brokerage for Client Referrals***

CCM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

CCM allows clients to direct brokerage. CCM may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage CCM may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

CCM maintains the ability to block trade purchases, sells, and other transactions across accounts. While block trading may benefit clients by purchasing larger blocks in groups, we do not feel that the clients who do not block trade are at a disadvantage due to the best execution practices of our custodian.

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed at least quarterly in personal advisory services, annually in simple investing services, and retirement consulting services only by Brian Alexander Bengry, Managing Member. Brian Alexander Bengry is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at IA are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Brian Alexander Bengry, Managing Member. There is only one level of review and that is the total review conducted to create the financial plan.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by different factors including but not limited to: material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least quarterly a written report detailing the client's account which may come from the custodian.

Personal Advisory Service clients paying an Investment advisory/management fee receive CCM financial planning services concerning their financial situation at no additional fee. After the presentation of the plan, there are annual updated review reports available at no additional charge.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

CCM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to CCM clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

CCM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

CCM does not take custody of client accounts at any time. Custody of client's accounts is held primarily at TD AMERITRADE Institutional, Division of TD AMERITRADE, Inc., member FINRA/SIPC/NFA or CHARLES SCHWAB & CO. member FINRA/SIPC/NFA. Clients will receive account statements from the custodian and should carefully review those statements.

## **Item 16: Investment Discretion**

For those client accounts where CCM provides ongoing supervision, CCM maintains limited power of authority over client accounts with respect to securities to be bought and sold and amount of securities to be bought and sold. All buying and selling of securities is explained to clients before an advisory relationship has commenced and is listed in the investment advisory contract as either discretionary or non-discretionary authorization.

## **Item 17: Voting Client Securities (Proxy Voting)**

CCM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

CCM does not require nor solicit prepayment of more than \$1200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither CCM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

CCM has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

CCM currently has only one management person/executive officer; Brian Alexander Bengry. Brian Alexander Bengry's education and business background can be found on the Supplemental ADV Part 2B form.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Brian Alexander Bengry's other business activities can be found on the Supplemental ADV Part 2B form.

### **C. How Performance Based Fees are Calculated and Degree of Risk to Clients**

CCM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### **D. Material Disciplinary Disclosures for Management Persons of this Firm**

In August 2008, while at JP Morgan Chase, a client alleges misrepresentation relating to the liquidity of an auction rate security purchased by Brian Alexander Bengry. JP Morgan Chase agreement to a settlement whereby the firm would buy back at par, the auction rate securities in addition to paying accrued interest on the par amount. Additional information is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

Neither CCM, nor its management persons, has any relationship or arrangement with issuers of securities.