



## CCM Investment Advisers, LLC.

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This Brochure provides information about the qualifications and business practices of CCM Investment Advisers, LLC. If you have any questions about the contents of this Brochure, please contact us at 803-254-9500 or [compliance@ccminc.com](mailto:compliance@ccminc.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.

CCM Investment Advisers, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

A copy of CCM's SEC Form ADV Part 1A, 2A and 2B is available upon request at no charge, by contacting John D. Leaphart([John@ccminc.com](mailto:John@ccminc.com)). CCM's Brochure is also available on our web site [www.ccminc.com](http://www.ccminc.com).

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

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\* A NOTE ABOUT THE FORMAT OF THIS BROCHURE: The SEC requires all investment advisers to organize their disclosure documents according to specific categories, some of which may not pertain to a particular adviser’s business. Where a required category is not relevant to our business, we list the category and state that it does not apply.

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## **Item 4 – Advisory Business**

### **A. Background**

CCM Investment Advisers, LLC (“CCM”) is an independent investment advisory firm established in 1986. Fowler W. Cary, Jr. is the principal owner of CCM.

### **B. Services Provided**

#### ***1. Portfolio Management Services***

CCM manages a variety of equity, fixed income, and balanced accounts for institutional and individual investors. CCM utilizes fundamental analysis in the selection of equity and fixed income securities, employing a range of strategies as described in more detail in Item 8 below.

CCM manages every client account as a separate portfolio based on that client’s investment objectives. Through the use of an investment policy statement, written investment instructions or the “CCM Client Investment Parameters” worksheet, the investment objectives and any client-imposed limitations are loaded into CCM’s proprietary Total Portfolio Management System (TPMS). Utilizing the TPMS, each portfolio manager is able to view investment objectives, client-imposed restrictions and other limitations, and risk profiles for each client as their individual account is managed. Each client may impose restrictions on investing in certain securities, types of securities, or asset classifications.

In addition to making its services available to clients through direct advisory arrangements, CCM may also act as subadviser to other registered investment advisers or banks (each a “primary adviser”). In such cases, the primary adviser appoints CCM to manage all or a portion of a client’s account. CCM does not charge subadvised clients separately for CCM’s management services, but rather, receives a portion of the fee charged by the primary adviser. CCM currently has subadvisory arrangements with South State Bank, and First Citizens Bank and Trust, and may enter into such arrangements with other primary advisers in the future.

#### ***2. Portfolio Management Through Wrap-Fee and Other Programs.***

CCM participates as a portfolio manager in various wrap-fee programs. Under such programs, a program sponsor (a registered broker-dealer and investment adviser that is not affiliated with CCM) assists the client in selecting a portfolio manager, effects purchases and sales of securities for the client’s account, acts as custodian of the client’s assets, monitors the portfolio manager’s performance and provides periodic reports to clients. The wrap program sponsor charges one bundled or “wrap” fee for all these services, and pays a portion of that fee to the portfolio manager. CCM currently participates in wrap-fee programs sponsored by Envestnet Asset Management, Inc., Wells Fargo Advisors, LLC, and FDx Advisors Inc.

CCM has other arrangements with clients whereby CCM contracts directly with and charges the client for portfolio management services, and the client contracts separately with a broker-dealer (or a dually registered broker-dealer/investment adviser) for portfolio execution and custody, as well as, in some cases, recordkeeping, non-discretionary investment advice, including manager

selection and other services that are provided to the client for an asset-based or some form of bundled fee.

The process by which CCM makes investment decisions in wrap-fee and other program accounts is the same as the process used for all its managed accounts. In all cases, CCM utilizes the Total Portfolio Management System described above.

### ***3. Portfolio Model Services***

In addition to managing client portfolios, CCM also offers non-discretionary purchase and sell recommendations in the form of model portfolios for other financial professionals to use with their own clients. CCM currently provides this service through the Unified Overlay Management Program operated by FDx Advisors Inc.

### ***4. Consulting Services***

As a separate service, CCM offers monthly client consultations that may include economic forecasts, interest rate forecasts, and other investment and finance discussions, data and forecasts as the client deems pertinent.

## **C. Assets Managed**

As of December 31, 2017, CCM managed client assets totaling \$2,697,530,000 on a discretionary basis. CCM does not manage assets on a non-discretionary basis.

## **Item 5 – Fees and Compensation**

### **A. Fees Paid to CCM**

#### ***1. Portfolio Management Services***

Client Fees are based on the fair market value of all assets under management in the respective portfolio. Annual fee schedules are as follows:

#### **Equity/Balanced Accounts**

Market Value of Managed Assets	Annual Fee
Up to \$ 5,000,000	0.75%
Next \$ 5,000,000	0.60%
Over \$ 10,000,000	0.50%
Over \$ 30,000,000	0.25%

## Fixed Income Accounts

Market Value of Managed Assets	Annual Fee
Up to \$ 5,000,000	0.50%
Next \$ 5,000,000	0.45%
Over \$ 10,000,000	0.40%
Over \$ 30,000,000	0.20%

In certain cases, advisory fees are negotiable depending on a variety of special factors that are based on a client's particular circumstances. Additionally, CCM will from time to time, negotiate flat-rate fees for investment supervisory services.

As explained above, in some cases CCM manages client assets as a subadviser, is paid a portion of the investment management fee received by the primary adviser and does not charge the client directly. Likewise, where CCM participates in a wrap-fee program, it is compensated by the wrap fee plan sponsor from the bundled fee charged to clients. The advisory fees it earns on such accounts range from 0.30% to 0.50%, based on the program and the strategy selected.

The specific manner in which CCM's fees are charged is established in a client's written agreement with CCM. CCM will generally bill its fees on a quarterly basis, in arrears, although Clients may elect to be billed in advance. Clients may also elect to be billed directly for fees or to authorize the custodian to debit fees from client accounts. Management fees may be prorated for each capital contribution and withdrawal made during the applicable calendar quarter under certain circumstances. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

### *2. Portfolio Model Services*

The fees for providing model portfolios are subject to negotiation, and are based on the total assets with respect to which such model portfolios are used. CCM currently charges 0.40% for its CCM Equity model portfolio.

### *3. Consulting Services*

CCM generally charges \$20,000 per quarter for its client consultation service.

## **B. Other Fees or Expenses Clients May Pay**

CCM's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by

managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. A complete description of brokerage and custodial fees can be obtained from the respective brokerage firm or custodian. CCM does not receive any portion of these commissions, fees, and costs. As noted above, some of CCM's clients have entered into arrangements whereby some of all of the fees described in this section may be charged on an asset-based fee or other bundled basis.

In addition to the foregoing, clients may incur additional expenses in the event that CCM purchases mutual funds or exchange-traded funds for the client accounts. Such funds charge their own internal management fees which are disclosed in the funds' prospectuses.

Item 12 of this brochure further describes the factors that CCM considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions). Item 12 also describes factors clients should consider in evaluating various brokerage arrangements.

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

CCM does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

### **Item 7 – Types of Clients**

CCM provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, endowments, municipalities, trust programs, sovereign funds, and other U.S. and international institutions, entities, or individuals.

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

CCM utilizes fundamental analysis in the securities selection process. Investment strategies are established based on each client's risk tolerance as specified in writing by the client on the "CCM Client Investment Parameters" form, accompanying the CCM Investment Advisory Agreement, through written instructions, or on an Investment Policy Statement. Investment strategies include, but are not limited to: "CCM Money Markets", "CCM Bonds", "CCM Low Risk Balanced", "CCM Moderate Risk Balanced", "CCM Core Balanced", "CCM Core Balanced Plus", "CCM Core Equity", "CCM Tech Select Equity," and "CCM International Equity."

CCM utilizes exchange-traded funds, equity, and fixed-income securities as appropriate for each specific investment strategy. While our objective is to maximize return for a given risk, there is a material risk that, because of factors known or unknown to CCM, the securities selected for the client could lose all of their value. Investing involves market, geopolitical, industry-specific,

company-specific, environmental, and other forms of risk. Investments in bonds entail interest-rate risk (the risk that a rise in interest rates will cause the price of the bond to fall) and credit risk (the risk of default).

The client is advised that no guarantees are made with regards to account performance. Investing in securities involves risk of loss that clients should be prepared to bear.

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

CCM has no information applicable to legal or disciplinary events material or immaterial to disclose.

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

CCM is not actively engaged in any business other than giving investment advice, and it does not sell products or services other than investment advice to clients. CCM is neither registered nor seeking to be registered in any capacity other than as an investment adviser, and the only registration status of CCM's management personnel is that of investment adviser representative.

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

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

CCM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and establishing as a priority, the fiduciary duty to our clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumormongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items. The Code of Ethics also establishes personal securities trading reporting and preclearance procedures, among other things. All supervised persons at CCM must acknowledge the terms of the Code of Ethics annually, or as amended.

A copy of our Code of Ethics is available, without charge, to clients and prospective clients upon request.

#### **B. Participation or Interest in Client Transactions**

This item does not pertain to our business.

#### **C. Personal Trading**

From time to time, CCM's supervised persons may buy and sell for their personal accounts the same securities that CCM purchases for client accounts, and the personal trades may occur at or

around the same time as the client trades. This situation presents a potential conflict between the supervised persons' interests and the interests of our clients. In order to address this potential conflict, the CCM Code of Ethics and related procedures are designed to ensure that the interests of our clients come first.

In this regard, the CCM Code of Ethics is designed to prevent the firm's supervised persons from improperly trading on inside information. Supervised persons must preclear any personal trades in initial public offerings (IPOs), limited partnerships and other limited offerings. With limited exceptions (such as for mutual funds and US Treasury bonds, etc.), supervised persons must report their securities holdings and trading activity to CCM's Chief Compliance Officer, who reviews the records to ensure that personal trades do not compromise the integrity of the services CCM provides to clients.

#### **D. CCM Client Privacy Policy**

The employees and systems of CCM will always be governed by service of the best interest of our clients. CCM restricts access to nonpublic personal information about our clients to those employees who need to know that information to provide products or services to that client. We maintain physical, electronic, and procedural safeguards to guard all nonpublic personal information. Please refer to the CCM Privacy Notice appended at the end of this Brochure for more information about the types of nonpublic personal information we collect about clients and how we use that information.

### **Item 12 – Brokerage Practices**

#### **A. Selecting Broker-Dealers**

As a discretionary investment manager, CCM has the authority to determine which securities are to be bought or sold and the amount to be bought or sold for its portfolio management clients. In a very limited number of cases, CCM is also authorized to select broker-dealers for client transactions and to negotiate commission rates paid on such trades on clients' behalf.

CCM uses its best judgement and experience to choose brokers who will seek to obtain favorable prices and executions on securities transactions. In addition, CCM may consider the quality, accuracy and efficiency of trade executions, access to inventory, the size and complexity of a particular transaction, the level of service provided by the broker-dealer, and as described further in the next section, the availability of ancillary research services.

It is CCM's policy that the firm will not, acting as principal, buy any securities from or sell any securities to an advisory client. CCM may, from time to time, and only when in the best interest of each client involved, purchase securities that are being sold from a managed account through a nonrelated broker-dealer, for the account of another client.

## **B. Soft-Dollar Practices**

CCM may place securities transactions with brokers that provide securities and statistical investment research information, other research services, and other services that aid the investment decision-making process, in arrangements designed to qualify under the safe harbor provided by Section 28(e) of the Securities Exchange Act of 1934. Such research services, information, and other services are expected to enhance the general portfolio management capabilities of CCM and will be, in the good-faith judgement of CCM, in the overall best interest of its clients' accounts.

Typical research and statistical assistance provided by brokers includes: analysts' reports on companies and industries, market forecasts, macro-economic analysis, industry forecasts, historical company financial data, quotation services, computer databases and software, and industry trade publications. The benefits realized from research services and data received from brokerage institutions accrue to all of our clients, not just the clients whose commissions pay for them. Brokers who provide research service may charge higher commissions than those who do not.

Please be advised that while CCM believes that the ancillary research services it receives from brokers enhance its general portfolio management capabilities and ultimately benefit clients, such arrangements might also be seen to confer a benefit on us, because we do not have to produce or pay for the research services we receive in this way. For this reason, the SEC requires us to disclose that we may have an incentive to select or recommend a broker-dealer based on our interest in receiving research rather than on client's interest in receiving the most favorable execution.

In order to protect clients' interest, CCM will periodically evaluate the services provided by brokers. Factors to be used in evaluating research services include the diversity of sources, market experience, analytical ability, professional stature and reputation, financial conditions, past performance, execution capabilities, and integrity. This process may result in the client's paying more than the lowest commission rate per share on trades.

Some services which aid in the investment decision-making process may have other uses that are not entirely investment decision-making related, such as administrative functions. Registrant will reimburse the brokers, which provide such services, for the administrative portion of such services based on a good-faith estimate of the cost of the pro-rata use of those services for administrative purposes.

## **C. Recommending Broker-Dealers**

If a client requests, CCM will recommend broker-dealers/custodians with whom clients may establish relationships. CCM typically offers suggestions for low-cost "execution-only" broker-dealers, "mid-priced" broker-dealers and "full-service" broker-dealers. While none of these broker-dealers is affiliated with CCM, some of the broker-dealers have referred clients to CCM in the past and may continue to do so in the future, which presents a potential conflict of interest. CCM addresses this potential conflict by not having formal arrangements or understandings that

CCM will recommend broker-dealers in exchange for referrals of clients, and by giving the client the ability to select the broker-dealer that best suits their objectives and needs.

#### **D. Directed Brokerage**

Except with regard to the limited number of clients who have authorized CCM to select broker-dealers on their behalf, CCM's clients enter into their own arrangements with the broker-dealers and custodians of their choosing and direct CCM to execute trades for their accounts with firms so selected. While this allows clients to satisfy their specific needs and preferences, it does present some important issues of which clients should be aware.

When a client instructs CCM to direct trading for the client's account to a particular broker-dealer, CCM's ability to seek best execution may be compromised, because we will not trade with other broker-dealers for the client's account and our ability to negotiate the commission rates charged to the account may be limited or eliminated. As a result of this brokerage direction, in some cases, the account may pay higher commissions, receive less favorable net prices or pay more administrative costs than it would otherwise. The disparity between the commissions a directed account pays and those available through other broker-dealers may be substantial. When a client negotiates a commission rate with a custodian/broker-dealer, they may not be receiving the lowest possible rate.

Furthermore, directed accounts may not be eligible to participate in favorable block trades that CCM could effect if accounts authorized us to select broker-dealers. Where fixed-income securities are bought or sold for an account, the client may pay a commission in addition to a mark-up or mark-down on the securities as a result of the directed brokerage situation.

From time to time the broker-dealers recommended to and/or selected by clients may offer clients the option to pay for brokerage and custody services by means of asset-based or fixed fees instead of commissions or other transaction-based fees. In reviewing possible fee arrangements with broker-dealers, clients should consider a number of factors, including the size of the portfolio and nature of the securities held; investment objectives and financial resources; past and anticipated trading practices, including trading volume; the client's knowledge of securities markets and financial capabilities; the projected cost of the arrangement and how that compares to the cost of paying for executions on a per-trade basis; the services provided; and personal preferences, including the desire for certainty or predictability of fees. The cost of the asset-based fee arrangement may be more or less than the cost of a commission-based brokerage account.

Clients also should know that the broker-dealers they have selected may have referred their accounts or other investment management accounts to CCM. As noted above, although we do not have formal referral agreements with broker-dealers, we do, from time to time, receive referrals from client-directed broker-dealers. Such referrals create a potential conflict between our clients' interests in obtaining best execution on their trades and our interest in receiving future referrals. Upon request, we will tell you if your account has been referred to us by the broker-dealer you have selected.

### **E. Bundling of Trades**

In certain circumstances, CCM will aggregate trades for the same broker-dealer to benefit clients through increased trading efficiency. However, because there are multiple portfolio managers who make individual investment decisions in their respective client portfolios at different times, there may be instances when like trades are transmitted for execution at different times in the same trading day to the same broker-dealer. This may result in situations where similar accounts receive different execution prices, different fees, and different commission rates, on the same day. Accordingly, every reasonable effort is made to ensure that we are acting in the best interest of our clients.

### **Item 13 – Review of Accounts**

Each account is reviewed by one of the Portfolio Managers on a regular basis. All investment advisory accounts are reviewed on a routine monthly cycle. Managers are alerted by the Total Portfolio Management System (TPMS) of changes such as cash inflows or outflows as they occur. Also, on an as needed basis, in addition to the routine monthly review, accounts are reviewed when changes are indicated in asset mix, equity selection, or fixed income selection. These actions will be appropriately reflected in each individual account. The reviewers are: Fowler W. Cary, Jr., President, Robert F. Key, Senior VP, Chris W. Antley, Senior VP, Michael A. Burkett, VP, John D. Leaphart, VP, Austin S. Fulmer, AVP, Joe H. Giltner, VP. Mr. Cary is the Overall Economic Strategist and Portfolio Manager. Mr. Key serves as the Fixed Income Strategist and Portfolio Manager. Mr. Antley serves as the Equity Strategist and Portfolio Manager. Mr. Burkett is head trader and Portfolio Manager. Mr. Cary also serves as the International Economic Equity Strategist.

On a calendar quarter basis, all clients are furnished an investment review that includes the following: time weighted rate of return for total account and components, individual securities cost basis and market value, summary of investments, income rate, current yield, purchase and sale summary, income and expense summary, and a contributions and withdrawals schedule for the current quarter. Unrealized gain/loss schedules are provided on a quarterly basis upon request. Realized gain/loss schedules are provided with the year-end statement.

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

### **A.**

CCM is not afforded any economic benefit other than the fee based on assets under management described in item 5.

### **B.**

Neither CCM nor a related person directly or indirectly compensates any person for client referrals. However, as discussed in Item 12 above, CCM may effect portfolio transactions with broker-dealers who have referred advisory clients to CCM.

## **Item 15 – Custody**

CCM does not have custody of client funds or securities. CCM maintains an independent accounting system reflecting initial positions and regular transactions as directed for execution or as advised by the respective custodian. Our client accounting department produces statements on a quarterly basis as referenced elsewhere in this document.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. CCM urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Should you have any question about differences between the respective statements, we encourage you to contact us, or your custodian.

## **Item 16 – Investment Discretion**

CCM receives discretionary authority from the portfolio management clients at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, CCM observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions must be provided to CCM in writing along with an executed contract and all required documentation before we will assume investment discretion.

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

### **Proxy Voting Policy**

CCM will accept responsibility to vote client securities when directed in writing. In all matters, CCM will act in the best interest of, and with the purpose of increasing the wealth of the shareholders, (i.e. our clients). If any material conflict of interest is discovered between CCM's interests and those of the client, it will be disclosed to the client and the proxy will be voted in the client's best interest. Accordingly, the voting decisions will be evaluated on a case-by-case basis, and guided by common sense and the prudent man principle. Clients may direct CCM to vote the proxy of a particular security in any manner that they desire, provided those instructions are made in writing and are received in a timely manner. CCM's proxy voting records and proxy voting policies and procedures are available upon request.

## **Item 18 – Financial Information**

This item does not pertain to our business.

## Supervised Persons



### CCM Investment Advisers, LLC

1201 Main Street, Suite 1910

Columbia, SC 29201

803-254-9500

[www.CCMINC.com](http://www.CCMINC.com)

Brochure Supplement Revised 03/26/18

**This Brochure Supplement provides information about Fowler W. Cary, Jr, Robert F. Key, Christopher W. Antley, Michael A. Burkett, Rebecca F. Rhodes, John D. Leaphart, Joe H. Giltner, II and Austin S. Fulmer, all of whom provide investment advice on behalf of CCM Investment Advisers, LLC. It supplements the CCM Investment Advisers, LLC Brochure. You should have received a copy of that Brochure. Please contact CCM Investment Advisers, LLC if you did not receive our Brochure or if you have any questions about the contents of this supplement. These documents are available in electronic or hard copy. Please contact us for a copy of either document at the above telephone number or via email at: [info@ccminc.com](mailto:info@ccminc.com).**

## **Fowler William Cary, Jr. –1947**

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

Wofford College, BA Government and Economics, 1969; University of South Carolina, MBA Business Administration and Finance, 1970.

Companion Capital Management, Inc., President and Chief Investment Officer, August 1986-August 2001; CCM Investment advisers, LLC, President, Chief Investment Officer, and Chief Compliance Officer, August 2001-December 2011; President, CEO and Chief Investment Officer, December 2011 to Present.

### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

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

This individual has no other material business activities.

### **Item 5- Additional Compensation**

This individual does not receive economic benefit in the form of prizes or sales awards or compensation for sales, client referrals, or new accounts. Through shared ownership in the profitability of the firm, CCM Investment Advisers' investment professionals have a clear vested interest in the long-term success of our clients.

### **Item 6 - Supervision**

Mr. Cary's investment adviser-related activities are supervised by the investment committee, which is made up of all portfolio managers. Mr. Cary is also supervised by CCM's Chief Compliance Officer, John D. Leaphart in accordance with the firm's compliance procedures and the Code of Ethics. You can reach Mr. Leaphart at 803-254-9500 or [compliance@ccminc.com](mailto:compliance@ccminc.com).

## **Robert Frazer Key-1958**

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

Furman University, BA Political Science 1980; University of South Carolina, MBA with concentration in Finance, 1982. Chartered Financial Analyst (CFA), November 2001

Companion Capital Management, Inc., Senior Vice President, October 1998-August 2001, CCM Investment Advisers, LLC, Senior Vice President, Chief Fixed Income Strategist August 2001-Present.

*To earn the CFA charter, you must successfully pass through the CFA Program, administered by the CFA Institute, a graduate-level self-study program that combines a broad curriculum with professional conduct requirements, culminating in three sequential exams. CFA Institute is a global, not-for-profit organization comprising the world's largest association of investment professionals.*

### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

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

This individual has no other material business activities.

### **Item 5- Additional Compensation**

This individual does not receive economic benefit in the form of prizes or sales awards or compensation for sales, client referrals, or new accounts. Through shared ownership in the profitability of the firm, CCM Investment Advisers' investment professionals have a clear vested interest in the long-term success of our clients.

### **Item 6 - Supervision**

Mr. Key's investment adviser-related activities are supervised by the investment committee, which is made up of all portfolio managers. Mr. Key is also supervised by CCM's Chief Compliance Officer, John D. Leaphart in accordance with the firm's compliance procedures and the Code of Ethics. You can reach Mr. Leaphart at 803-254-9500 or [compliance@ccminc.com](mailto:compliance@ccminc.com).

## **Christopher Wilson Antley-1965**

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

University of South Carolina, BS Finance, 1988; University of South Carolina, MBA with concentration in Finance and Investments, 1990.

Companion Capital Management, Inc., Senior Vice President may 1990-August 2001, CCM Investment Advisers, LLC, Senior Vice President, Chief Equity Strategist, August 2001-Present.

### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

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

This individual has no other material business activities.

### **Item 5- Additional Compensation**

This individual does not receive economic benefit in the form of prizes or sales awards or compensation for sales, client referrals, or new accounts. Through shared ownership in the profitability of the firm, CCM Investment Advisers' investment professionals have a clear vested interest in the long-term success of our clients.

### **Item 6 - Supervision**

Mr. Antley's investment adviser-related activities are supervised by the investment committee, which is made up of all portfolio managers. Mr. Antley is also supervised by CCM's Chief Compliance Officer, John D. Leaphart in accordance with the firm's compliance procedures and the Code of Ethics. You can reach Mr. Leaphart at 803-254-9500 or [compliance@ccminc.com](mailto:compliance@ccminc.com).

## **Michael Anthony Burkett-1973**

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

University of South Carolina, BS Business Finance, 1998; Chartered Financial Analyst (CFA), September 2003.

Companion Capital Management, Inc. Vice President, July 1998-August 2001, CCM Investment Advisers, LLC, Vice President, Chief Trader, August 2001-Present

*To earn the CFA charter, you must successfully pass through the CFA Program, administered by the CFA Institute, a graduate-level self-study program that combines a broad curriculum with professional conduct requirements, culminating in three sequential exams. CFA Institute is a global, not-for-profit organization comprising the world's largest association of investment professionals.*

### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

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

This individual has no other material business activities.

### **Item 5- Additional Compensation**

This individual does not receive economic benefit in the form of prizes or sales awards or compensation for sales, client referrals, or new accounts. Through shared ownership in the profitability of the firm, CCM Investment Advisers' investment professionals have a clear vested interest in the long-term success of our clients.

### **Item 6 - Supervision**

Mr. Burkett's investment adviser-related activities are supervised by the investment committee, which is made up of all portfolio managers. Mr. Burkett is also supervised by CCM's Chief Compliance Officer, John D. Leaphart in accordance with the firm's compliance procedures and the Code of Ethics. You can reach Mr. Leaphart at 803-254-9500 or [compliance@ccminc.com](mailto:compliance@ccminc.com).

## **Rebecca Folline Rhodes-1973**

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

University of South Carolina, BS Business Management and Marketing, 1995

Companion Capital Management, Inc., Regional Marketing Director January 2001-August 2001,  
CCM Investment Advisers, LLC., Regional Marketing Director, August 2001-Present

### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

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

This individual has no other material business activities.

### **Item 5- Additional Compensation**

This individual does not receive economic benefit in the form of prizes or sales awards or compensation for sales, client referrals, or new accounts from any entity other than CCM Investment Advisers, LLC. However, they have the potential to earn additional economic benefit, in the form of an annual bonus, which is based in part, on the number or amount of sales, client referrals, or new accounts. Through shared ownership in the profitability of the firm, CCM Investment Advisers' investment professionals have a clear vested interest in the long-term success of our clients.

### **Item 6 - Supervision**

Ms. Rhodes' investment adviser-related activities are supervised by the investment committee, which is made up of all portfolio managers. Ms. Rhodes is also supervised by CCM's Chief Compliance Officer, John D. Leaphart in accordance with the firm's compliance procedures and the Code of Ethics. You can reach Mr. Leaphart at 803-254-9500 or [compliance@ccminc.com](mailto:compliance@ccminc.com).

## **John David Leaphart-1970**

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

Clemson University, BS Business Management 1992  
Emory University, Goizueta Business School. MBA 2014

Companion Capital Management, Inc. Vice President, Chief Trader July 1994-August 2001, CCM Investment Advisers, LLC, Vice President, August 2001-January 2006. Mr. Leaphart was employed by Netjets Aviation, Inc. as a Line Captain between 2001 and 2009. Netjets Aviation, Inc. is a subsidiary of the Berkshire Hathaway Company.  
CCM Investment Advisers, LLC., Vice President, July 2009-Present. Chief Compliance Officer December 2011-Present.

### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

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

Mr. Leaphart is the President and owner of Leading Edge Consulting, LLC of South Carolina. The sole business of Leading Edge Consulting, LLC is or relates to aviation operations consulting.

### **Item 5- Additional Compensation**

This individual does not receive economic benefit in the form of prizes or sales awards or compensation for sales, client referrals, or new accounts. Through shared ownership in the profitability of the firm, CCM Investment Advisers' investment professionals have a clear vested interest in the long-term success of our clients.

### **Item 6 - Supervision**

Mr. Leaphart's investment adviser-related activities are supervised by the investment committee, which is made up of all portfolio managers. Mr. Leaphart is also supervised by CCM's President and Chief Executive Officer, Fowler W. Cary, Jr. You can reach Mr. Cary at 803-254-9500.

## **Joe Harvey Giltner, II – 1987**

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

Darla Moore School of Business, University of South Carolina, BS Business Administration 2011. Chartered Financial Analyst (CFA), July 2016.

CCM Investment Advisers, LLC, Intern- June 2011 – December 2011

CCM Investment Advisers, LLC, Assistant Vice President- December 2011-August 2016, Vice President-August 2016-Present.

*To earn the CFA charter, you must successfully pass through the CFA Program, administered by the CFA Institute, a graduate-level self-study program that combines a broad curriculum with professional conduct requirements, culminating in three sequential exams. CFA Institute is a global, not-for-profit organization comprising the world's largest association of investment professionals.*

### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

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

This individual has no other material business activities.

### **Item 5- Additional Compensation**

This individual does not receive economic benefit in the form of prizes or sales awards or compensation for sales, client referrals, or new accounts. Through shared ownership in the profitability of the firm, CCM Investment Advisers' investment professionals have a clear vested interest in the long-term success of our clients.

### **Item 6 - Supervision**

Mr. Giltner's investment adviser-related activities are supervised by the investment committee, which is made up of all portfolio managers. Mr. Giltner is also supervised by CCM's Chief Compliance Officer, John D. Leaphart in accordance with the firm's compliance procedures and the Code of Ethics. You can reach Mr. Leaphart at 803-254-9500 or [compliance@ccminc.com](mailto:compliance@ccminc.com).

## **Austin Scott Fulmer – 1988**

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

Darla Moore School of Business, University of South Carolina, BS Business Administration  
2011

CCM Investment Advisers, LLC, Intern- May 2009 – August 2011  
CCM Investment Advisers, LLC, Assistant Vice President- September 2011- Present

### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

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

This individual has no other material business activities.

### **Item 5- Additional Compensation**

This individual does not receive economic benefit in the form of prizes or sales awards or compensation for sales, client referrals, or new accounts. Through shared ownership in the profitability of the firm, CCM Investment Advisers' investment professionals have a clear vested interest in the long-term success of our clients.

### **Item 6 - Supervision**

Mr. Fulmer's investment adviser-related activities are supervised by the investment committee, which is made up of all portfolio managers. Mr. Fulmer is also supervised by CCM's Chief Compliance Officer, John D. Leaphart in accordance with the firm's compliance procedures and the Code of Ethics. You can reach Mr. Leaphart at 803-254-9500 or [compliance@ccminc.com](mailto:compliance@ccminc.com).

**FACTS****WHAT DOES CCM INVESTMENT ADVISERS, LLC  
DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

**What?**

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- assets and transaction history
- investment experience and risk tolerance

When you are *no longer* our customer, we continue to share your information as described in this notice.

**How?**

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons CCM Investment Advisers, LLC chooses to share and whether you can limit this sharing.

<b>Reasons we can share your personal information</b>	<b>Does CCM Investment Advisers LLC share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes</b> —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> —to offer our products and services to you	No	No
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes</b> —information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes</b> —information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	No

**Questions?**

Call 803-254-9500 or contact [John@ccminc.com](mailto:John@ccminc.com)

**What we do**

<b>How does CCM Investment Advisers, LLC protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does CCM Investment Advisers, LLC collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ open an account or give us contact information</li> <li>■ enter into an investment adviser contract or give us your income information</li> <li>■ tell us about your investment or retirement portfolio</li> </ul> <p>We also collect your personal information from other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing</p>

**Definitions**

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ CCM Investment Advisers, LLC <i>has no affiliates</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>CCM Investment Advisers, LLC does not share with nonaffiliates so they can market to you</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>CCM Investment Advisers, LLC does not jointly market</i></li> </ul>