Connecticut Capital Management Group, LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Connecticut Capital Management Group, LLC. If you have any questions about the contents of this brochure, please contact us at (203) 877-1520 or by email at: bparke@connecticutcapital.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 Connecticut Capital Management Group, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Connecticut Capital Management Group, LLC's CRD number is: 305013.

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Registration as an investment adviser or use of the word "registered" (or any derivative thereof) does not imply a certain level of skill or training.

Version Date: 03/13/2026

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Connecticut Capital Management Group, LLC on 03/16/2025 are described below. Material changes relate to Connecticut Capital Management Group, LLC's policies, practices or conflicts of interests.

- Connecticut Capital Management Group, LLC has updated its Outside Business Activity. (Item 10.C)
- Connecticut Capital Management Group, LLC updated Item 15 to disclose Custody is also disclosed in Form ADV because the firm has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA).

Future Changes:

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by securities administrators.

At any time, you may view our most-recent Disclosure Brochure through the Investment Adviser Public Disclosure which is accessible through the following hyperlink through a keyword search using our firm name or CRD number: www.adviserinfo.sec.gov.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Connecticut Capital Management Group, LLC (hereinafter "CCMG") is a Limited Liability Company organized in the State of Connecticut. The firm was formed in May 1998, and the principal owner and Chief Compliance Officer is Brian Parke.

B. Types of Advisory Services

Discretionary Portfolio Management Services

CCMG offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. CCMG creates a Financial Plan and/or an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then aids in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

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

CCMG evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Financial Plan and/or Investment Policy Statement, which is given to each client.

CCMG seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of CCMG's economic, investment or other financial interests. To meet its fiduciary obligations, CCMG attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, CCMG's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is CCMG's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

CCMG may offer investment advisory services through use of third-party managers ("Outside Managers") for portfolio management services. Before selecting other advisers for clients, CCMG will always ensure those other advisers are properly licensed or registered as an investment adviser. CCMG conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. CCMG will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

CCMG retains the authority to terminate the services of the third-party portfolio managers, hire new managers, and reallocate your invested assets among portfolio managers. CCMG also maintains discretion over client assets held with the third-party managers.

CCMG will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the third party managed account(s).

Financial Planning

Financial plans and financial planning may include, but are not limited to: goal and cash flow planning; investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Pension Consulting Services

CCMG offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending third party managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of third-party managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Services Limited to Specific Types of Investments

CCMG does not limit the types of investments it recommends. CCMG generally provides investment advice related to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, hedge funds, private equity funds, ETFs, treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities, venture capital funds, private placements, and structured notes. CCMG may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

CCMG will tailor an investment portfolio for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by CCMG on behalf of the client. CCMG may use model allocations together with a specific set of recommendations for each client based on their personal 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 CCMG from properly servicing the client account, or if the restrictions would require CCMG to deviate from its standard suite of services, CCMG reserves the right to terminate the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. CCMG does not participate in wrap fee programs.

E. Assets Under Management

CCMG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$ 253,772,665	$148,756	December 2025

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

The same fee schedule applies regardless of whether CCMG manages the portfolio with or without use of the Independent Manager.

Total Assets Under Management	Annual Fees
$0 - $1,000,000	1.20%
$1,000,001 - $5,000,000	0.95%
$5,000,001 - $25,000,000	0.70%
$25,000,001 – And Up	0.45%

In the event CCMG utilizes third party money managers for portfolio management services, there may be an additional 0.15% fee on all assets under third party management.

Except where otherwise noted in CCMG's Investment Advisory Contract, CCMG uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Fees may be negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of CCMG's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Asset-based portfolio management fees are withdrawn directly from the client's accounts, with client's written authorization, quarterly in arrears.

Pension Consulting Services Fees

Total Assets Under Management	Annual Fee
$0 - $1,000,000	1.50%
$1,000,001 - $5,000,000	1.00%
$5,000,001 - $25,000,000	0.75%
$25,000,001 – And Up	0.50%

Except where otherwise noted in CCMG's Pension Consulting Agreement, CCMG uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees may be negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of CCMG's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement immediately upon written notice.

Asset-based pension consulting fees are withdrawn directly from the client's accounts, with client's written authorization, quarterly in arrears.

Financial Planning Fees

Financial Planning fees are generally included in the Portfolio Management Fee. If no assets are managed by CCMG, the negotiated fixed rate for creating client financial plans is between $1,000 and $20,000. Clients may terminate the agreement without penalty, for full refund of CCMG's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

Financial planning fees are paid via check, 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

B. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CCMG. Please see Item 12 of this brochure regarding broker-dealer/custodian.

C. Prepayment of Fees

CCMG collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within thirty days to the client via check, or return deposit back to the client's account.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

D. Outside Compensation for the Sale of Securities to Clients

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

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

CCMG 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

CCMG generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans
- Foundations/Non-Profit Organizations

CCMG generally does not require an account minimum.

Each client will be required to execute an advisory agreement with CCMG and to establish an account with a third-party qualified custodian in order to become a client of CCMG.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

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

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Investment Strategies

CCMG believes in the long-term orientation of its investment program and does not intend to seek to exploit opportunities that may exist in the short-term. While CCMG does not time markets, there may be periods where it tilts the portfolio towards characteristics which are more favorable under current or anticipated market environments.

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 Risks

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.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Investment Strategies Risks

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: Although CCMG will seek to select only third-party managers who will invest clients' assets with the highest level of integrity, CCMG's selection process cannot ensure that third party managers will perform as desired and CCMG will have no control over the day-to-day operations of any of its selected third-party managers. CCMG would not necessarily be aware of certain activities at the underlying third-party manager level, including without limitation a third-party manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

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

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency. Not all investment types listed below will be used in a client's portfolio, and other investment types not listed here may be utilized.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. Equity can be invested in US, International, or Emerging Market companies. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions, and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and

counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks.

Hedge funds often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; may involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

Private equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Structured notes are debt securities issued by financial institutions with performance linked to an underlying index or indices. Specifically, the return is typically based on a single equity, a basket of equities, equity indices, interest rates, commodities, or foreign currencies. The performance of a structured note is linked to the performance of the underlying investment, so risk factors applicable to that investment will also apply to the structure note. Investing in structured notes also carries liquidity risk, credit risk, and market risk. There is also the risk of capital loss and additional complexity beyond more direct investment in the underlying asset.

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

Neither CCMG nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

Neither CCMG nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

Brian Parke is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. CCMG always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of CCMG in connection with such individual's activities outside of CCMG.

Brian Daniel Parke is a Board Member of the Rape Crisis Center of Milford and The Devon Rotary Club of Connecticut..

Jill Demanchyk Lanese is a fitness instructor at YMCA of Central Connecticut.

Jordan Christopher Marino is a Board Member at CFA Society Hartford, dedicating approximately 10 hours per month outside trading hours. Responsibilities include collaboration and voting.

Eddy Kojo Agyeman serves as a Board Member of Open Door Shelter, contributing 0 hours during work and 5 hours per week after work.

D. Selection of Other Advisers or Managers

CCMG may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Clients will pay CCMG its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between CCMG and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. CCMG will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. CCMG will ensure that all recommended advisers are licensed or notice filed in the states in which CCMG is recommending them to clients.

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

A. Code of Ethics

CCMG has 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. CCMG's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of CCMG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of CCMG to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest. CCMG will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

From time to time, representatives of CCMG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of CCMG to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest; however, CCMG will never engage in trading that operates to the client's disadvantage if representatives of CCMG buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

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

Custodians/broker-dealers will be recommended based on CCMG's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and CCMG may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in CCMG's research efforts. CCMG will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

CCMG recommends Charles Schwab & Co., Inc. Advisor Services.

1. Research and Other Soft-Dollar Benefits

While CCMG has no formal soft dollars program in which soft dollars are used to pay for third party services, CCMG may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). CCMG may have access to soft-dollar benefits consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not that particular client's transactions paid for it, and CCMG does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Clients should be aware that CCMG's acceptance of soft dollar benefits could result in higher commissions charged to the client. This creates a conflict of interest in that CCMG benefits by not having to produce or pay for the research, products or services, and CCMG will have an incentive to recommend a broker-dealer based on receiving research or services rather than on our clients' interest in receiving most favorable execution. However, CCMG does not select the custodians or broker-dealers based on any soft dollar or other benefits that are or may be received by CCMG. Rather, CCMG's selection is based on the overall quality of execution and services provided to or for the benefit of CCMG's clients. Please see Item 14 as well.

2. Brokerage for Client Referrals

CCMG 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

CCMG may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any

authority granted to CCMG to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If CCMG buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, CCMG would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. CCMG would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with CCMG's duty to seek best execution, except for those accounts with specific brokerage direction (if any). When CCMG does not or cannot aggregate trades, clients may receive less favorable prices, pay higher brokerage commissions, or experience less efficient trade execution.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews

All client accounts for CCMG's advisory or pension consulting services provided on an ongoing basis are reviewed at least annually by Brian Parke (Principal & CCO) with regard to clients' respective investment policies and risk tolerance levels. All accounts at CCMG are assigned to this reviewer. The accounts are monitored on an ongoing basis.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Brian Parke (Principal & CCO). Financial planning clients are provided a financial plan concerning their financial situation. For Financial Planning included with Portfolio Management, plans are reviewed at least annually with clients. For Fixed Fee Financial Planning, there are no further reports after the presentation of the plan.

B. Factors That Will Trigger a Non-Periodic Review

Reviews may be triggered by material market events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to fixed fee financial plans, CCMG's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of CCMG's advisory services provided on an ongoing basis will receive a monthly or quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This statement will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties

Various third-party vendors, managers, or fund companies may offer economic benefits to CCMG. These economic benefits include but are not limited to research, consulting, coaching, event invitations, sponsoring client events, and client relationship management tools. Some of these offerings may benefit CCMG's advisory practice without necessarily benefitting client accounts. These benefits could influence CCMG to use the Manager for its investment management which creates an inherent conflict of interest. That said, CCMG remains a fiduciary to its clients and endeavors at all times to put its clients' interests first.

Charles Schwab & Co., Inc. Advisor Services provides CCMG with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For CCMG client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to CCMG other products and services that benefit CCMG but may not benefit its clients' accounts. These benefits may include national, regional or CCMG specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of CCMG by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities.

Other of these products and services assist CCMG in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account

statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of CCMG's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of CCMG's accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to CCMG other services intended to help CCMG manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to CCMG.

CCMG is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

B. Compensation to Non – Advisory Personnel for Client Referrals

CCMG pays Eric A. Tashlein, a former employee, a portion of the gross fees paid by clients he introduced to CCMG during the term of his employment between July 2021 and December 2022. Outside of these payments, CCMG does not pay for 3rd party referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, CCMG will be deemed to have limited custody of client's assets and must have written authorization via the Advisory Agreement from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Custody is also disclosed in Form ADV because CCMG has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, CCMG will follow the safeguards specified by the SEC rather than undergo an annual audit.

Item 16: Investment Discretion

CCMG provides discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, CCMG generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or

sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. In some instances, CCMG's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to CCMG).

Item 17: Voting Client Securities (Proxy Voting)

CCMG 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

CCMG neither requires nor solicits prepayment of more than $1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions

Neither CCMG nor its management has any financial condition that is likely to reasonably impair CCMG's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions

CCMG has not been the subject of a bankruptcy petition.