ITEM 1 – COVER PAGE

Part 2A of Form ADV: Firm *Brochure*

This brochure provides information about the qualifications and business practices of Coordinated Capital Securities, Inc. ("CCS"). If you have any questions about the contents of this disclosure brochure, please contact us:

By phone: (608) 221-4545

By email: info@ccsmadison.com

By Mail: 229 S. Main Street, Fort Atkinson, WI 53538

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration as an investment adviser does not imply a certain level of skill or training.

For more information about our Firm, including our Form CRS, please visit our website at https://ccsmadison.com/#disclosures. Additional information about CCS is available on the SEC's website at https://adviserinfo.sec.gov.

Date of this Brochure: June 25, 2026

ITEM 2 – MATERIAL CHANGES

You may obtain a copy of our most current Disclosure Brochure at any time at no charge by contacting us at (608)221-4545, toll-free at (800)783-6666 or by email at info@ccsmadison.com. Our current brochure is also available on the SEC's website at https://adviserinfo.sec.gov or you may request a copy from your CCS Financial Professional.

There have been no material changes made to this Brochure since the last update on June 25, 2025.

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ITEM 4 - ADVISORY SERVICES

Coordinated Capital Securities, Inc. (CCS or Firm) is a Wisconsin corporation located in Fort Atkinson, Wisconsin. CCS is registered with the Securities and Exchange Commission (SEC) as both a broker-dealer and an investment adviser and is a member of the Financial Industry Regulatory Authority (FINRA) and Securities Investor Protection Corporation (SIPC). CCS has been registered as an investment adviser since 1988. CCS is wholly owned by Coordinated Capital Holdings, Inc., a holding company. Coordinated Capital Holdings, Inc. is owned by Mari J. Buechner. As of the date of this Brochure, CCS has assets of $84,213,190 that are managed on a discretionary basis and $52,624,551 managed on a non-discretionary basis.

This brochure is intended to provide you with information regarding our investment advisory services, fees, compensation, and business practices that you should consider before opening or maintaining an advisory account with our Firm. For information about our business practices, compensation and conflicts of interest related to our brokerage services, please see our Best Interest Disclosure guide available on our website at http://www.ccsmadison.com/#disclosures.

Only individuals who are licensed, qualified, and authorized as an investment adviser representative with our firm are permitted to offer advisory services on behalf of CCS (hereafter referred to in this disclosure as "Financial Professionals"). Most of our Financial Professionals are approved to provide brokerage services in their separate capacity as Registered Representatives of our dually registered broker-dealer. Recommendations regarding your advisory account are made in an advisory capacity. Recommendations regarding your brokerage accounts are made in a broker-dealer capacity. Your Financial Professional must tell you what capacity they are acting in before making a recommendation. Your account opening documentation will also indicate the capacity in which your Financial Professional is acting. For detailed information regarding the distinctions between our brokerage and advisory services, please see our Customer Relationship Summary (Form CRS) at our website http://www.ccsmadison.com/#disclosures.

We offer advisory services to you through Financial Professionals located across the country. Our Financial Professionals are independent contractors and not employees of CCS. Our Financial Professionals may use marketing names or other names that are held out to the public. Such names are known as "doing business as" or "dba" names. If they do, they have been instructed to disclose in client communications or communications with the public, that their advisory services and securities are offered through CCS.

Conflicts of Interest. This Brochure discusses conflicts of interest that may be relevant to CCS' business as a federally registered investment adviser under the Investment Advisers Act of 1940, as amended. Our conflicts of interest are typically the result of compensation arrangements between us, our Financial Professionals, our clients and third parties. We are disclosing conflicts of interest as described in this brochure, to help you make informed investment decisions.

Business Continuity Plan. CCS has established a Business Continuity Plan (BCP). The BCP describes how we respond to significant business disruption and provides clients with alternative contact information in the event of a significant business disruption. Our Business Continuity Summary can be found on our website at http://www.ccsmadison.com/#disclosures. It is also available upon written request.

Clearing Services. CCS has entered into an agreement with Wells Fargo Advisors ("WFA"), pursuant to which WFA provides the brokerage and custodial services, including trading and execution, with respect to the advisory programs. In November 2016, First Clearing, LLC merged and consolidated its operations into Wells Fargo Advisors, LLC. The resulting firm is now known as Wells Fargo Clearing Services, LLC (WFCS), Member SIPC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company. WFCS operates its brokerage and advisory business under the trade name Wells Fargo Advisors. First Clearing is also a trade name used by WFCS when carrying customer accounts and acting as custodian for funds and securities deposited through introducing firms such as CCS or as a result of transactions it processes for customer accounts. Throughout this brochure we will refer to First Clearing when describing accounts held through our clearing firm.

General Description of Advisory Programs and Services

CCS Financial Professionals provide clients with investment management and/or consulting services in connection with programs we developed, through programs sponsored by Wells Fargo Advisors (WFA) and through third-party investment management programs. Programs we sponsor are described in this Brochure. Programs sponsored by WFA and other third-party managers are described in Appendix 1 of our Form ADV 2A Brochure (hereafter Wrap Fee Brochure) which is available on our website at http://www.ccsmadison.com/#disclosures.

Advisory Services Tailored to Client's Individualized Needs. Our services are always provided based on the individual needs of each client. Clients are given the ability to impose restrictions on their accounts including specific securities, types of securities or sectors. It is important that you contact CCS or your Financial Professional when your financial situation changes, your investment objectives have changed, or if you want to impose and/or modify any reasonable restrictions on your advisory program account.

Specialization. Investment strategies and philosophies differ among Financial Professionals who are responsible for determining and implementing their own investment advice under the supervision and compliance controls of CCS. CCS does not consider itself as specializing in any one form of advisory service.

Advice Limited to Certain Types of Investments. With some exceptions, Financial Professionals are available to offer advice on most types of investments owned by a client and, at the specific request of a client, will explore investment options not currently owned by a client. However, Financial Professionals are not permitted to provide advice on futures or commodity contracts. Third Party Managers used by Financial Professionals must be approved by CCS. If a Financial Professional is dually registered as a Registered Representative with CCS, the Financial Professional will be restricted to providing advice based on the FINRA licenses they hold. You can review the licenses held by your Financial Professional by visiting FINRA's BrokerCheck system at http://brokercheck.finra.org.

We Offer Both Wrap-Fee and Traditional Investment Management Programs. We provide asset management services through both wrap-fee programs and traditional management programs. For the wrap fee programs we offer, we receive a portion of the wrap fee for our services. Programs sponsored by WFA are wrap-fee programs and our involvement is limited to offering and recommending these programs to clients. From a management perspective, there is not a fundamental difference in the way our Financial Professionals manage a wrap fee account versus a

traditional management account. The significant difference is the way in which transaction services are paid. In our traditional management programs, there are two separate types of fees. You pay an advisory program fee for our advisory services, and a transaction charge ("ticket charge") for each transaction (i.e., buy/sell/exchange), for accounts held at First Clearing. This creates a conflict of interest for CCS in that there is an incentive to have Financial Professionals trade more given the revenue we receive from ticket charges. Under a wrap-fee program, advisory services and transaction services are provided for one fee and therefore are generally higher than traditional management programs.

We Offer Both Advisory and Brokerage Services. You may purchase many of our products and services in either transaction-based brokerage account or fee-based advisory account, or a combination of both. While there are similarities between the brokerage and advisory services we provide, there are important differences, including the pricing structures for these services. When deciding which, if any, of the advisory programs available through us is appropriate for your needs, you should bear in mind that fee-based accounts, when compared with commission-based accounts, may result in lower costs during periods when trading activity is heavier, such as the year an account is established. However, during periods when trading activity is lower, fee-based accounts could result in higher annual costs. The total cost of a fee-based account versus a commission-based account can vary significantly and depends upon a number of factors, including:

- Product and service preferences
- Size and value of your account(s)
- Mix of products you hold
- Frequency with which you trade
- Administrative or management fees associated with the products or services you purchase

CCS and your Financial Professional may receive higher compensation for fee-based advisory accounts over time as compared to commission-based brokerage accounts. A conflict exists if a recommendation is made to establish or convert a commission-based brokerage account to a wrap-fee advisory program account that may not be appropriate based on your anticipated trading activity and need for ongoing monitoring and advice. To mitigate this conflict, we will explain the advantages and disadvantages of a fee-based advisory account versus a commission-based brokerage account prior to opening the account.

CCS-Sponsored Investment Management Programs

CCS sponsors the investment consulting and continuous investment management advisory programs (collectively referred to as "CCS managed programs"). CCS managed programs are not wrap fee programs and you pay standard clearing account transaction and other fees in addition to your program fee. Your Financial Professional (at their sole discretion) may elect (but is not obligated) to pay these fees rather than pass them through to you for certain account types. If your Financial Professional chooses to absorb the ticket charge, a conflict of interest is created due to the increased expense that your Financial Professional incurs. These charges and other costs are explained in more detail in Item 5 of this brochure.

Investment consulting services are non-discretionary and offered under the Investment Consulting

Agreement (ICA). Continuous investment management services are offered on a discretionary (Financial Professional-directed) or non-discretionary (client-directed) basis under the Continuous Investment Management Agreement (CIM). You must designate in writing trading authority for the account as discretionary or non-discretionary in the CIM program agreement. Your Financial Professional will assist you in determining your account objectives and establish a portfolio that consists of, but is not necessarily limited to, equity investments, fixed income and mutual funds. Your Financial Professional then manages your investments in a manner consistent with your stated objectives. When providing continuous investment management services, your Financial Professional will provide continuous (on-going) investment advice based on your individual needs. CCS generally requires using First Clearing as the qualified custodian and clearing broker/dealer for all client accounts established in programs we sponsor.

You should discuss with your Financial Professional the costs and benefits of each CCS managed program and then select the one you believe best supports your investment goals and preference and provides a cost-effective means of executing your investment strategy. For example, you should consider the amount of anticipated trading activity when selecting a CCS managed program and assessing the overall cost. Advisory programs typically assume a normal amount of trading activity and, therefore, under particular circumstances, prolonged periods of inactivity or asset allocations with significant fixed income or cash weightings may result in higher fees than if commissions were paid separately for each transaction.

A conflict of interest exists if your Financial Professional recommends you establish or convert a commission-based brokerage account to an advisory account that may not be appropriate based on your anticipated trading activity, need for ongoing monitoring and advice, and other factors. To mitigate this conflict, your Financial Professional will explain the advantages and disadvantages of a fee-based advisory account versus a commission-based brokerage account prior to recommending or opening an account. You should discuss the advantages and disadvantages of fee-based and commission-based accounts with your Financial Professional prior to opening an advisory program account and periodically after your account is opened.

WFA-Sponsored Investment Management Programs

Through our relationship with First Clearing, we offer the following WFA-Sponsored Investment Management wrap fee programs. The description provided in this section regarding the WFA-sponsored programs is intended to provide you with a brief summary of each program. For additional information regarding WFA sponsored programs, see Appendix 1 of this Form ADV Part 2A brochure (hereafter "CCS Wrap Fee Program Brochure") available on our website at http://www.ccsmadison.com/#disclosures or you may request a copy from us or your Financial Professional. For programs managed by WFA (Fundsource/Pathways, Custom Choice, Personalized UMA) you will also be provided with a full description and disclosure document at the time you establish a program account. For third-party manager programs, you will also receive a copy of all third-party money managers disclosure document.

Financial Planning and Limited Scope Consulting Services

Financial planning is a process where you work with your Financial Professional to determine your current financial situation, develop your financial goals, evaluate a course of action and create a

financial action plan. You make the ultimate decision to accept or reject implementation of the financial plan. Limited scope consulting services are generally provided on a short-term basis and address a specific service or concern such as evaluating investment options, asset re-allocation, retirement or education planning options and other life event planning services. Financial planning and limited scope consulting services do not include on-going account monitoring or active management of your account(s) unless requested by you and provided under a separate advisory program agreement. When providing financial planning and consulting services, a written report may or may not be provided based on the scope of the service and your preference and objectives. If you choose to receive financial planning or consulting services, you will be required to execute an Investment Consulting Agreement (ICA). Upon delivery of the final report, plan or services rendered, this agreement will end.

Retirement Plan Consulting Services

CCS and our Financial Professionals offer various levels of advisory and consulting services to individual retirement plans, employee benefit plans and/or to the participants of such plans ("participants").

Individual Retirement Accounts. For individual retirement plans, advisory services include, but are not limited to, recommendations of account type, investments to buy, sell and hold in the account, recommendations to fund the account or take a distribution and recommendations to rollover existing retirement assets such as an employer-sponsored qualified retirement plan (QRP) to an IRA account with CCS. You should be aware that there are costs associated with opening a new IRA account with CCS including one-time set up fees, annual custodian fees as well as investment costs for the investments held in your IRA. These costs, over time, may be more or less than costs associated with leaving your retirement assets in your existing IRA or QRP. No client is under any obligation to rollover an existing IRA or QRP assets to a retirement account managed by CCS.

Retirement Plans, Plan Sponsors and Participants. CCS and our Financial Professionals can offer non-discretionary advisory services to employee benefit plans, plan sponsors and/or to the participants of such plans. Retirement plan services are provided under the Retirement Plan Consulting Agreement (RPCA).

Plan Sponsors. Plan services are designed to assist plan sponsors in meeting their management and fiduciary obligations to participants under the Employee Retirement Income Securities Act ("ERISA"). When we provide advice to plan sponsors, neither CCS nor CCS Financial Professional should be considered a fiduciary of the plan within the meaning of ERISA. Plan sponsors make the ultimate decisions for the plan including whether to act on advice provided by CCS Financial Professionals. Plan sponsors make the ultimate decisions for the plan including whether to retain CCS to provide advisory services to the plan which may also include services at the participant level. Plan sponsors are under no obligation to implement recommendations we provide and may seek independent advice about the appropriateness of plan recommendations we make.

Services for Plan Participants. Plan sponsors can retain CCS and its Financial Professionals to provide retirement plan services to participants. The exact scope and types of services provided will be discussed and agreed upon with each plan sponsor client. CCS Financial Professionals will meet with individual participants to collect information regarding their financial situation and investment

objectives. Financial Professionals will deliver general financial and investment education, interactive investment materials, and information based on asset allocation models to the participant. The service and any material provided will be general in nature and for the purpose of investment education.

Retirement Asset Movement Recommendations. CCS Financial Professionals may recommend you rollover or transfer retirement assets held in an individual retirement account (IRA) or employer-sponsored qualified plan (such as 401(k), 403(b), 457(b), profit sharing or defined benefit pension plans) to an IRA at CCS. You should be aware that rolling over retirement assets to an account with our Firm is just one of multiple options for your retirement assets. You should review and consider with your Financial Professional the advantages and disadvantages of rolling your retirement assets to a retirement account at CCS versus other options available to you. A conflict of interest exists in that CCS and your Financial Professional benefit in that we will receive a financial benefit if you do transfer these assets and will not if you do not. To mitigate this conflict, your Financial Professional will provide you with a comparison of factors to consider before making your decision. Furthermore, by rolling over an account into an account managed by our firm, you may bear higher costs than you are bearing with your existing retirement plan or than you would bear if your account were held with another firm. You are responsible for evaluating the advantages and disadvantages for moving such assets (verses continuing to hold them in the plan or IRA), such as those identified in our Retirement Asset Rollover Guide available on our website at https://ccsmadison.com/#disclosures or previously provided to you or available to you upon request.

Third Party Manager Services

CCS provides advisory services by referring clients to outside, or unaffiliated, third-party managers that are registered as investment advisers. CCS refers clients to such third-party managers in return for a portion of the advisory fee paid by the client. Third-party managers are responsible for continuously monitoring client accounts. The programs offered by third-party managers may not be available to all clients because of account minimums, client objectives and manager restrictions. Depending on the program you select, the third-party manager may or may not have discretionary power to purchase or sell investments in your account. Your Financial Professional will assist you in selecting a suitable investment portfolio and asset allocation strategy that will be used by the third-party manager to properly allocate your assets in the investment portfolio. Your Financial Professional will provide initial and ongoing education concerning the asset allocation strategy selected and act as a liaison between you and the third-party manager should you have questions regarding your account. Your Financial Professional will periodically meet with you to discuss changes in your investment objectives and risk tolerance, and current asset allocations within each portfolio. CCS does not guarantee the performance of any third-party manager; thus, losses can occur from following any recommendation from CCS, its Financial Professionals, or third-party managers. For specific details regarding the third-party manager program, service or fees please review the third-party manager's Form ADV Part 2A brochure which is available through your Financial Professional upon request.

ITEM 5 – FEES AND COMPENSATION

We and our Financial Professionals are compensated for the advisory services we provide by charging you a fixed, hourly or asset-based fee. The fees associated with the advisory program you select will be described in Schedule A of your advisory program agreement. The table below summarizes CCS advisory program fees.

ADVISORY SERVICE OR PROGRAM	HOURLY	FIXED-FEE	ANNUAL ASSET-BASED FEES
Investment Consulting	N/A	N/A	Not to exceed 1.50%
Continuous Investment Management	N/A	N/A	Not to exceed 2.00%
Financial Planning & Limited Scope Consulting	$50 - $250/HR	$500 - $50,000	N/A
Retirement Plan Consulting	$50 - $250/HR	$500 - $50,000	Not to exceed 1.00%
WFA-Sponsored Investment Management Programs	N/A	N/A	See CCS Wrap Fee Brochure
Third-Party Investment Manager Programs	N/A	N/A	Range 0.25%-1.00%

The amount of the fee is negotiable and will vary depending on the scope and complexity of the engagement, nature and number of investments in a client's portfolio, the experience and standard fees charged by the CCS Financial Professional providing the service, your geographic location and amount and nature of research required to complete the plan or service. Lower fees for comparable service may be available from other sources. You have the option to purchase investment products we recommend through other broker-dealers not affiliated with our Firm.

CCS Sponsored Investment Consulting and Continuous Management Programs

Program fees are calculated annually and charged quarterly in advance. The maximum program fee will not exceed 1.50% for investment consulting services and 2.00% for continuous investment management services on an annual basis. The program fee is negotiable and is subject to discounts on a Financial Professional-by-Financial Professional, client-by-client, or account-by-account basis. These discounts are a consideration for the Financial Professional when choosing a program to recommend. A portion of the program fee received by CCS is paid to your Financial Professional (on average 80-90%) in accordance with their compensation agreement with CCS. Program fees are typically deducted directly from your advisory program account. You must provide written authorization to have us deduct fees from the program account. You may direct us to pay the fee from a different account. If approved by us, you may also pay advisory fees upon receipt of a billing invoice from us in lieu of having fees debited directly from the account. Cash balances will be included as billable assets if authorized by you in Schedule A of your program agreement. Your Financial Professional (at their sole discretion) may elect (but is not obligated) to reduce or exclude your program fee on specific assets in your CCS managed program account or defer charging the program fee for a period of time. Program fee reductions, exclusions and deferrals, if any, are described in Schedule A of your CCS managed program agreement and vary from client to client.

The qualified custodian will send you client statements, at least quarterly, showing all disbursements for the program account including the amount of the advisory fee deducted. A conflict of interest exists in that the negotiated program fee will be paid to CCS and your Financial Professional regardless of the services provided or the level of trading in the account, until such time as either party terminates the advisory program agreement. As a result, CCS and your Financial Professional have a financial incentive to recommend an advisory account over a commission-based brokerage account. We address these conflicts of interest through disclosure here and the asset-based fee in Schedule A of your advisory program agreement which you must acknowledge by your signature. You may also terminate your advisory program agreement with 5 days' notice if the services do not meet your

advisory program account objectives in relation to the fee charged. Upon termination of the program, any pre-paid advisory fees will be prorated, and an unearned fee will be prorated and refunded to you. No adjustment or refund will be made with respect to partial withdrawals during any fee period. No fee adjustment will be made during any fee billing period for appreciation or depreciation in value of the assets in your account during that period.

For newly established advisory accounts where assets transfer in from other broker-dealers or outside accounts, and for CCS brokerage accounts that convert to advisory accounts, the initial fee will be based on the market value of your program account assets as of the date your program account is accepted by CCS or the date of initial account funding (whichever is later) and pro-rated for the number of days remaining in the quarter. Thereafter the fee will be based upon the closing price on the last day of the previous quarter. For example:

Billing Period:	July 1, 2026 – September 30, 2026
Account Value as of:	June 30, 2026 (last business day of the previous calendar quarter)
Account Value:	$100,000
Annual Fee:	1.25%
Quarterly Fee:	0.3125%
Fee Amount:	$312.50

Financial Planning and Consulting Services

Our financial planning and consulting services are offered on an hourly or fixed-fee basis and vary, depending upon the extent, nature and complexity of the advice requested. Hourly fees range from $50 to $250 per hour and fixed fees can range from $500 to $50,000. Fees are quoted in advance, are negotiable and, in some cases, can be waived if other services are provided. For fixed-fees, one half of the estimated fee may be due upon signing of the advisory program agreement with the balance due after project completion. If paying an hourly fee, any additional hourly work will be determined prior to the work being performed and agreed to by you. You will not be charged more than $1,200 in fees per client, six months or more in advance. You can authorize fee payment for these services from either a CCS brokerage account, a CCS advisory account or make payment by check to CCS. The financial plan or consulting services established with us pursuant to your program agreement concludes with your receipt of the written financial plan report or with the conclusion of the consulting service provided. Financial plans and/or consulting service recommendations are not required to be implemented through CCS.

Financial planning and consulting fees as described above, do not include the fees you will incur for other professionals (i.e. personal attorney, tax adviser, or accountant) in connection with the financial planning process. Fees for ongoing financial planning and/or consulting services are due in accordance with the timeframe agreed upon between you and your Financial Professional. Certain charges are imposed by third parties other than CCS in connection with investments and transactions recommended through planning and consulting arrangements, including but not limited to, mutual fund fees, custodial fees and standard clearing account fees. Planning and consulting fees charged by CCS are separate and distinct from the fees and expenses charged by investment company securities that are recommended to you and separate from standard clearing account fees.

Retirement Plans and Plan Participants Advisory Service Fees

Fees for advisory services to Retirement Plans and Plan Participants are charged as an hourly or fixed fee, a percentage of a plan's assets, or a combination of these methods, as agreed to between CCS and the Plan Sponsor. The exact fee charged will depend on the variables, such as the number of participants, the amount of assets in the Plan, the complexity of the situation, the location of the client, and the CCS Financial Professional providing services. In the event fees are charged based on the percentage of the Plan assets, the maximum fee charged will not exceed 1.00% annually. The fee charged for reviewing individual Participant accounts is contingent upon the amount of assets held within the accounts being reviewed and the number of accounts being reviewed.

Third-Party Investment Management Programs

Third-party investment advisers generally have account minimum requirements that will vary from investment adviser to investment adviser. A complete description of the third-party investment adviser's services, fee schedules and account minimums will be disclosed in the third-party investment adviser's Form ADV, wrap fee brochure, or similar disclosure brochure which will be provided to you at the time an agreement for services is executed. It is important that you review these materials to familiarize yourself with the third-party investment adviser chosen.

Financial Professionals will charge you a fee for the services that he/she provides. The Financial Professional fee is based on a percentage of the value of your assets. The fee is negotiable and is subject to discounts on a Financial Professional-by-Financial Professional, client-by-client, or account-by-account basis. Third-party investment advisers charge clients a separate fee based upon services provided by the third-party investment adviser. The fee is separate from and may not include custodial charges, transaction charges, contingent deferred sales charges on funds purchased prior to their participation in the account, mutual fund sales load, 12b-1 fees, surrender charges, debit balances or related margin interest, or other costs imposed by third parties. Fees are determined by the Financial Professional, the third-party investment adviser and you through the use of an appropriate management program agreement. Third-party manager program fees will vary from client to client and may be higher than those obtainable from other third-party managers or other Financial Professionals providing similar services.

Compensation, Fees and Conflicts of Interest

Investment Costs. Investments that are interests in investment funds, such as mutual funds, non-traded investments, and UITs, or products, such as college savings plans and variable insurance products, bear ongoing fees and expenses that are embedded into the cost of the investment holding. You pay these ongoing fees and expenses indirectly because they are factored into the cost of the investment. Advisory program fees charged by CCS are separate and distinct from the fees and expenses charged by investment company securities that are recommended to you. More information about ongoing fees and expenses associated with investment company securities is available in the fund or product prospectus.

Mutual Fund Trails. Some mutual fund share classes charge a distribution fee pursuant to Rule 12(b)-1 under the Investment Company Act of 1940. These fees are commonly referred to as "12b-1 fees" or "trails". For example, some mutual fund share classes charge 12b-1 fees to cover certain costs of fund distribution and sometimes shareholder services. These recurring fees, which are included in a

mutual fund's total annual fund operating expenses, vary by share class, but typically range from 0.25% to 1.00% annually. They are deducted from the mutual fund's assets on an ongoing basis and paid to the fund's distributor or principal underwriter, which generally remits the 12b-1 fees to the broker-dealer that distributed or sold the shares. For your benefit, we have instructed First Clearing to credit back to your fee-based account any 12b-1 fees we receive from the mutual funds in program account assets.

Mutual Fund Share Class Selection. Many mutual funds also offer share classes that do not charge 12b-1 fees such as institutional shares or Class I shares (collectively "advisory shares"). An investor who holds advisory shares of a mutual fund will usually pay lower total annual fund operating expenses over time – and thus will generally earn higher returns – than one who holds a share class of the same fund that charges 12b-1 fees. If a mutual fund offers an advisory share, and you are eligible to own it, it is often, though not always, better for you to purchase or hold the advisory share.

CCS does not make all share classes available to advisory program accounts. Designated share classes availability will depend on share classes offered by First Clearing or other custodial platforms, or whether the fund imposes a minimum investment amount to acquire or hold the share class. Therefore, CCS can purchase, hold, and recommend share classes in your program account that are not the lowest-cost share class and you should not assume that you are invested in the lowest-cost share class. Higher-cost share classes can result in lower returns, which could impact your account performance over time. CCS will periodically monitor mutual fund positions in program accounts to determine if a lower-cost share is available to you. Although CCS has supervisory procedures in place to determine if a lower-cost share class is available, in addition to reading this brochure carefully, you are urged to ask your Financial Professional whether lower-cost share classes are available and/or appropriate for your program account in consideration of your expected investment holding periods, amounts invested, and anticipated trading frequency. Further information regarding fees and charges assessed by a mutual fund is available in the appropriate mutual fund prospectus.

To assist in the advisory share selection process, CCS and its Financial Professionals will utilize the Advisory Share Class Finder Tool (AST) provided by First Clearing. The AST will display available advisory share classes that are on First Clearing's mutual fund "allowable" list. A financial incentive does not exist for CCS or its Financial Professionals to recommend higher-cost shares over available lower-cost shares in that we have instructed First Clearing to refund 12b-1 fees received by CCS directly to your advisory program account. The crediting of 12b-1 fees to your advisory program account alleviates the potential conflict of interest associated with CCS receiving this compensation.

For newly established advisory accounts and for CCS brokerage accounts that convert to advisory accounts, existing mutual fund positions will be evaluated to determine whether any position is eligible to convert to a lower-cost advisory share class if available. In an effort to provide advisory clients with lowest-cost share classes in advisory program accounts, CCS will perform ongoing reviews to help identify any conversion requirements to existing mutual fund positions in fee-based accounts we sponsor. CCS will convert higher-cost share classes in your advisory program with lower-cost share classes offered by the fund company, that we identify and for which you are eligible. During the conversion, you will see this share class exchange on your First Clearing account statement as a delivery of shares out and a receipt of shares in. The number of shares may vary due to the difference in the net asset value (NAV) of the share classes, but the aggregate investment amount is the same.

There is not a cost for share class conversions.

Dual Registration. CCS is registered as both a broker-dealer and an investment adviser. Financial Professionals, acting in their separate capacities as Registered Representatives of CCS, sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, alternative investments, and variable annuity and variable life products to advisory clients. As such, some Financial Professionals suggest that advisory clients implement investment advice by purchasing securities products through a commission-based CCS brokerage account in addition to an advisory account. In the event that you elect to purchase these products through CCS, CCS and your Financial Professional, in the capacity as a CCS Registered Representative, will receive the normal and customary commission compensation, including on-going trails for products that pay them, in connection with the specific product purchased. This presents a conflict of interest, as it gives the CCS Registered Representative an incentive to recommend investment products on the compensation received, rather than on your needs. A conflict of interest also exists if CCS and your Financial Professional can or did receive both a commission and an advisory fee on the same asset. To eliminate this conflict, you are asked to disclose in Schedule A of the advisory program agreement any non-billable positions in which you have paid a front-end load or commission to CCS in the previous 36 months. Non-billable assets will not be charged the investment advisory fee for one year after the advisory program account opening. You have the option to purchase investment products or implement investment advice we recommend through other broker-dealers, custodians or product sponsors that are not affiliated with us. However, you should understand that due to certain regulatory constraints CCS Financial Professionals must place all purchases and sales of securities products in commission-based brokerage accounts through CCS or other CCS approved institutions.

Standard Clearing Transactions and Account Fees. For traditional advisory programs we sponsor that are held at First Clearing, CCS acts as the introducing broker for transactions in these accounts. CCS managed programs are not wrap fee programs and you will incur brokerage and other transaction costs as described in Item 12 of this brochure. For more information on standard transaction and account fees visit our website at http://www.ccsmadison.com/#disclosures or ask your Financial Professional.

Termination of Services

The advisory program agreement may be terminated by the client or CCS by notifying the other party in writing and termination will become effective upon receipt of such notice. Upon termination of the Agreement, any pre-paid advisory fees will be prorated, and an unearned fee will be prorated and refunded to you. At termination, you can instruct CCS to either liquidate positions in your advisory program account, transition account positions to a commission-based account with CCS or transfer the account to another financial institution. If so instructed, we will process your request in an orderly and efficient manner. You will be subject to standard clearing transaction and account fees for positions sold in your account or transferred to another financial institution after the termination. You should also keep in mind that the decision to liquidate positions including mutual funds may result in tax consequences that should be discussed with your tax advisor. We will not be providing advisory services and will not be monitoring or reviewing account performance after the account has terminated. If we receive liquidation instructions from you, we are not responsible for market fluctuations from termination notice until complete liquidation. If an advisory program account is

terminated and transitioned to a commission-based account with CCS, advisory share mutual fund positions may be changed, and/or your shares exchanged into shares of another mutual fund share class. Not all mutual fund share classes used in our advisory program accounts are available in a commission-based brokerage account. Eligibility is determined by the Fund company or custodian not CCS.

ITEM 6 – PERFORMANCE-BASED FEES / SIDE-BY-SIDE MANAGEMENT

CCS does not charge performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains on or capital appreciation of your assets. Side-by-side management refers to the practice of managing both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee.

ITEM 7 – TYPES OF CLIENTS/MINIMUM ACCOUNT SIZE

CCS provides investment advice to individuals, trusts, estates or charitable organizations, plan sponsors, pension and profit-sharing plans, corporations, or other business entities. CCS typically imposes a minimum investment amount of $25,000 to establish a CCS managed program account. CCS will accept accounts with less than $25,000 in assets if CCS believes that, based on information provided by you to your Financial Professional, investing a lower amount is appropriate for you and is acceptable to the program sponsor. WFA-Sponsored investment management program minimums are described in our CCS Wrap Fee Program Brochure. For specific details regarding the third-party manager program minimums, please review the third-party manager's Form ADV Part 2A brochure which is available through your Financial Professional upon request.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Our Financial Professionals use various methods of analysis and investment strategies. Methods and strategies will vary based on the Financial Professional providing advice. Models and strategies used by one Financial Professional may be different than strategies used by another Financial Professional. CCS may use fundamental and/or technical methodologies and may subscribe to information providers that focus on those areas. A variety of informational resources are used to perform the security analysis, such as financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports of issuers of securities, prospectuses and reports filed by issuers of securities with the U.S. Securities and Exchange Commission, company press releases and estate planning, financial planning and income tax services purchased on a subscription basis.

Investment Strategies used in our advisory programs are long term purchases (securities held at least a year), short term purchases (securities sold within a year), trading, margin transactions, covered option writing, tactical asset allocation and strategic asset allocation. The specific program and strategy that is chosen will determine the types of investments that are used. CCS may recommend exchange-traded funds ("ETF"). ETF shares are bought and sold at market price, unlike mutual funds. ETFs are subject to risks similar to those of stocks. You should be aware that exchange traded funds ("ETFs") incur a separate management fee, typically 0.20%-0.40% of the fund's assets annually (although individual ETFs may have higher or lower expense ratios), which is assessed by the fund directly and not by CCS. This management fee is in addition to the ongoing advisory fee assessed by CCS and will generally be applicable for accounts that invests in ETFs.

Risk of Loss: Investing in securities involves risk of loss that you should be prepared to bear. In choosing any advisory services through us, be aware that all investments are at your own risk exclusively and we do not guarantee any return on the investments recommended or advised upon. There is no guarantee that the advisory services provided by us will result in meeting your goals and objectives. Investment decisions made for your account may be subject to numerous risks, such as market, interest rate, currency, economic, political and business risks, among others. Past performance is no guarantee of future results. Because of the inherent risk of loss associated with investing, we are unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

ITEM 9 – DISCIPLINARY INFORMATION

On September 17, 2020, CCS agreed to the entry of an Order by the U.S. Securities and Exchange Commission (the "SEC") which found that CCS did not disclose in its Form ADV that it was receiving fees pursuant to Rule 12b-1 under the Investment Company Act of 1940 ("12b-1 fees") in connection with its mutual fund share class selection practices in CCS sponsored managed accounts.

The Order found that from January 2014 through December 2018, CCS did not disclose the conflict of interest arising from its selection of mutual fund share classes that charged 12b-1 fees instead of lower-cost share classes of the same funds and that CCS breached its duty to seek best execution for its clients by causing certain advisory clients to invest in fund share classes that charged 12b-1 fees when share classes of the same funds that presented a more favorable value for these clients under the particular circumstances in place at the time of the transactions were available to the clients. The SEC's Order also found that CCS did not adopt and implement written compliance policies and procedures reasonably designed to prevent violations of the Advisers Act and the rules thereunder in connection with its mutual fund share class selection practices.

As part of the settlement terms of the Order, without admitting or denying the findings, CCS agreed to cease and desist from committing or causing any violations and any future violations of Sections 206(2) and 206(4) of the Advisers Act and Rule 206(4)-7; a censure; pay a civil penalty and disgorgement and prejudgment interest to affected clients; and commit to certain undertakings as outlined in the Order. As a result of the Order, CCS has updated its Form ADV disclosures, updated company policies and procedures, identified clients eligible to convert to a lower-cost share class and implemented an on-going program to move advisory clients who were in applicable mutual fund share classes to a lower cost share class, as available.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

CCS is not and does not have a related company that is an (1) investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund", and offshore fund), (2) futures commission merchant, commodity pool operator, or commodity trading advisor, (3) banking or thrift institution, (4) accountant or accounting firm, (5) lawyer or law firm, (6) pension consultant, (7) real estate broker or dealer, or (8) sponsor or syndicator of limited partnerships.

CCS is registered with the Securities and Exchange Commission (SEC) as both a broker-dealer and an investment adviser and is a member of the Financial Industry Regulatory Authority (FINRA) and

Securities Investor Protection Corporation (SIPC). CCS is an introducing broker dealer that introduces customer accounts and securities transactions, on a fully disclosed basis, to First Clearing. First Clearing is located at One North Jefferson Avenue, St. Louis, MO 63103.

As part of the investment advisory programs offered to clients, CCS, in its capacity as a broker/dealer, provides brokerage execution services to CCS advisory clients participating in CCS managed programs. For non-wrap accounts managed by CCS and held by First Clearing, CCS acts as the introducing broker for transactions in these accounts and you will pay brokerage and other transaction costs (including ticket charges). CCS has directed First Clearing to mark-up certain transaction and non-transaction fees, which CCS then receives indirectly from you. This is described in more detail in Item 12 of this brochure.

As previously stated in Item 5 of this brochure, some Financial Professionals are also Registered Representatives of CCS, in its capacity as a broker/dealer. As such, they suggest that advisory clients implement investment advice by purchasing securities products through a commission-based brokerage account in addition to an advisory account. In this case your Financial Professional, in the capacity as a CCS Registered Representative, will receive the normal and customary commission compensation, including on-going trails for products that pay them, in connect with the specific product purchased. This presents a conflict of interest, as it gives the CCS Registered Representative an incentive to recommend investment products on the compensation received, rather than on your needs.

CCS is affiliated with Coordinated Capital Consultants (CCC), an insurance general agency under common ownership with CCS. Some of our Financial Professionals are insurance agents of CCC and some Financial Professionals are independently licensed as insurance agents. In these capacities, CCS and your Financial Professionals may recommend insurance products in connection with investment advisory services. You are not obligated to purchase any insurance products through CCC or through your Financial Professionals acting in their individual capacity as an insurance agent. However, when you do purchase such products, commissions for the sale of insurance products from various, unaffiliated, insurance companies are received. Implementing and purchasing of any insurance product is solely at your discretion.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics. To help us avoid conflicts of interest, we have developed a Code of Ethics designed to protect our professional reputation and comply with federal and other applicable securities laws. The Code of Ethics sets forth guidelines and restrictions for personal securities trading, including an absolute prohibition of trading on the basis of "inside" (material, non-public) information. Adherence to the Code of Ethics is a condition of employment or affiliation with our firm. This disclosure brochure is provided to give you a summary of our Code of Ethics. However, if you wish to review the Code of Ethics in its entirety, you may request a copy from us or your Financial Professional.

Personal Trading Policy. From time-to-time CCS or one or more of its supervised persons purchases or owns the same securities and investments that your Financial Professional recommends to you. The fact that some CCS supervised persons have personal accounts is a conflict of interest due to the potential that a Financial Professional devotes more time to monitoring his or her personal accounts as opposed to spending that time on the review and monitor of your accounts. In addition, there is a

potential that Financial Professionals favor their personal accounts over your accounts. When the recommendation to you involves individual stocks, stock options, bonds and other general securities there can be a conflict of interest with you because the Financial Professional has the potential to engage in practices such as front-running and other activities that are potentially detrimental to you. CCS has adopted policies and procedures to ensure that such conflicts are fully disclosed and that CCS, its Financial Professionals or supervised persons do not trade ahead of or otherwise against the interest of you.

ITEM 12 – BROKERAGE TRANSACTIONS

Although CCS has authority to select the brokerage firm through which transactions are placed, Financial Professionals usually suggest that clients use the brokerage services of CCS and do not exercise discretion to secure the services of any other broker-dealer. You should be aware that designating and using a single broker-dealer, including CCS, for execution of securities transactions, will not allow CCS to receive research from other broker-dealers in return for commission business, to combine transaction orders with those of other client accounts for volume commission discounts or allow CCS to exercise discretion to evaluate the quality of execution services and commissions of other broker-dealers. You should also be aware that Financial Professionals in their capacity as a CCS Registered Representatives are allowed to set commission rates paid by clients. Therefore, commission rates will vary from client-to-client and also may be higher or lower than available through other firms. Because of these factors, designating CCS as broker-dealer may not result in best price or execution of client transactions.

CCS and our Financial Professionals offer and recommend advisory services, advisory programs, and investment products only with advisory programs, custodians and third-party managers with which CCS has entered into a clearing, advisory, selling or other distribution agreement with. Other firms may offer advisory and investment products and services not available through CCS, or the same or similar advisory and investment products and services at lower cost. Pursuant to our clearing agreement, First Clearing provides custody and other services to CCS clients. Although a client is not obligated to utilize the custody services of First Clearing, we believe its use is a convenient means of obtaining efficient transaction executions, and account reference and reporting services. Financial Professionals typically recommend the services of CCS and First Clearing because using any other firm would cause CCS's internal operating expenses to be greater.

Advisory programs CCS sponsors are not wrap fee programs and you will incur standard clearing transaction and account fees. CCS has directed First Clearing to mark-up transaction fees (such as ticket charges) and certain non-transaction fees, which CCS then receives indirectly from you. This arrangement provides a financial incentive for CCS to maintain the relationship with First Clearing. These fees and expenses will apply to your program account(s) separate from your advisory fees. This additional compensation presents a conflict of interest because CCS receives a financial benefit when it provides these services for your program account. CCS does not share this compensation with your Financial Professional, so your Financial Professional does not have a financial incentive to recommend transactions for which these charges apply or for CCS to provide these additional services. CCS believes the account charges assessed for transactions in your advisory program account are competitive with charges of other broker-dealers available to you. These disclosures are made so you may make an informed decision whether to open or continue to maintain an advisory program

account with CCS given this conflict.

CCS and its Financial professionals do not direct transactions and the commissions they generate (soft dollars) to brokerage firms or other parties to receive research or other benefits. CCS may combine similar client orders into one aggregate order for the purpose of obtaining an average price for all customers participating in the order.

Best Execution. CCS is obligated to seek best execution pursuant to its fiduciary duty as an SEC registered investment adviser for all trades executed, however better executions may be available through another broker/dealer based on a number of factors including volume, order flow and market making activity. Best execution does not necessarily mean the lowest cost provider. We will exercise reasonable diligence to ensure best execution is obtained for all clients when implementing any client transaction. CCS conducts periodic trade reviews to determine the duty of best execution is being met by its trade execution and clearing firm.

Margin Balance. When you open an account with First Clearing you have the ability to purchase securities on credit, also known as margin purchases. When you purchase securities on margin you are charged interest on the margin balance. CCS determines the margin rates to be charged to you, which creates a conflict of interest. We earn the difference between the interest rate charged to you and our cost of funds. We do not share this revenue with Financial Professionals and the conflict exists only at the Firm level but can create incentives for us to encourage margin borrowing to receive this compensation. To mitigate this conflict our default clearing option at account opening is a cash account and clients must sign a separate margin agreement before the account will be margin-enabled.

Risk of Margin. To the extent margin is used in your advisory program account, you should be aware that the margin debit balance will not reduce the market value of eligible assets and will therefore increase the asset-based fee you are charged. The increased asset-based fee may provide an incentive for your Financial Advisor to recommend the use of margin strategies. The use of margin is not suitable for all investors, as it increases leverage in your account and therefore risk.

Handling of Trade Errors. It is CCS' policy to ensure trading errors are handled and corrected in a timely manner and in the best interests of the client affected by the error. Specifically, when CCS or a Financial Professional cause a trade error to occur in a client account that results in a loss, we will work to resolve the error in order to reimburse any costs paid by you and make whole your transaction as it should have originally taken place/or not taken place. If the trade error results in a gain and CCS executed the transaction, CCS will keep that gain to offset future losses. The retained gain is not shared with the Financial Professional or account owners.

Cash Sweep Program. The Cash Sweep Program is offered by First Clearing and allows you to earn a return on the uninvested cash balances in your account by automatically placing (sweeping) cash balances into an interest-bearing FDIC insured cash account. The banks participating in the program share a portion of the revenue the bank earns on the investor's deposits with First Clearing who in turn shares a portion of this revenue with CCS. We do not share this revenue with Financial Professionals. Advisory program accounts are excluded from this revenue sharing arrangement and a Firm-only conflict exists when we receive this revenue on non-advisory brokerage accounts you may have through our broker-dealer. This conflict can create incentives for CCS to promote the cash sweep program to receive revenue sharing payments on brokerage accounts. More information about the

Cash Sweep Program can be found in the Cash Sweep Program Disclosure Statement available at our website http://www.ccsmadison.com/#disclosures under the heading “Clearing Firm Accounts”.

ITEM 13 – REVIEW OF ACCOUNTS

While CCS does not set a specific timeframe for account reviews, it does require Financial Professionals to contact their clients at least annually, or at the client’s request, to discuss the client’s investment portfolio and to update the client’s financial and other account information should any changes have occurred. Financial Professional offer to provide an annual financial review to every client, and CCS also encourages you to request such a review with your Financial Professional to discuss such things as account performance, changes in your investment objectives, goals, and financial situation, tax planning, estate planning, retirement planning , the appropriateness of continuing to maintain an advisory account over other account types and any additional questions you have concerning your investment portfolio. If you receive only financial planning services, you are charged a separate fee for meetings with your Financial Professional. You should carefully read your advisory program agreement including Schedule A to determine the amount of such fees, if any.

You will receive periodic account statements (not less than quarterly) from First Clearing or other custodians. These statements generally contain a listing of account assets and values as of the closing date of the statement. The information in these reports will vary from custodian to custodian. We urge clients to carefully review these statements and compare the statements with any report CCS or your Financial Professional may provide that compile or consolidates investment holdings and/or performance results. Financial Professionals are not required to provide regular written reporting on your program account to supplement account statements or other reports you receive from program sponsors. Those clients contracting only for limited-scope consulting or for the preparation for a financial plan will not receive regular reports on their accounts as their advisory services contract expires upon completion of the analysis and payment of the invoice. The Financial Professional responsible for managing your advisory program account will perform account reviews. CCS will also conduct oversight account reviews for advisory program accounts as required by SEC and FINRA guidelines. Changes in the economy, world events, news on various investments/products, among others may prompt additional reviews of any account that may be affected.

ITEM 14 – CLIENT REFERRAL AND OTHER COMPENSATION

CCS pays referral fees to other individuals for referring clients to our firm. We require these individuals to comply with applicable laws, rules and regulations related to solicitation activities, including any state rules requiring registration. Individuals with which we have a solicitor arrangement have a financial interest in referring clients to our Firm and Financial Professionals and receive a percentage of the advisory fee you pay our firm. No additional fees are assessed when clients are referred to our Firm. If you are introduced to our Firm or one of our Financial Professionals through a soliciting partner, you will receive a separate written disclosure document that contains important information related to the solicitor arrangement. You should review this document carefully before opening an advisory account with our Firm. CCS and its Financial Professionals may refer clients to third party money managers in return for a portion of the fee earned by the manager. The referral fee arrangement is disclosed to clients prior to the client entering into a management agreement with the manager. After making the referral, Financial Professionals typically provide consulting services designed to monitor the performance of the manager selected by the client.

Non-Cash Compensation. Certain product sponsors provide CCS and CCS Financial Professionals with economic benefits as a result of your Financial Professional's recommendation or sale of the product sponsors' investments. This compensation includes occasional gifts up to $100 per vendor per year, occasional meals, tickets or other entertainment of reasonable and customary value, and product sponsor support of educational or training events (which include educational events financial professionals arrange for clients and prospects) and seminars and/or payment of expenses related to training and education of financial professionals, which can (and often do) include a non-training element of the event. These economic benefits could influence your Financial Professional to recommend certain products/programs over others.

Outside Business Activities. Your Financial Professional may also be engaged in activities outside of advisory and brokerage services through CCS. Your Financial Professional could be an accountant, attorney, real estate agent or tax preparer, for example. Your Financial Professional may receive greater compensation through the outside business than through CCS or have another incentive to recommend or sell products through the outside business. All outside business activities conducted by CCS Financial Professionals must be approved by CCS. If you engage with a CCS Financial Professional for services separate from CCS, you may wish to discuss with him/her any questions you have about the compensation he/she receives from the engagement. Additional information about your Financial Professional's outside business activities is available on FINRA's website at http://brokercheck.finra.org.

ITEM 15 – CUSTODY

Client assets are maintained at the client's "qualified custodian" in a separate account in your name. However, CCS is deemed to have custody over client funds and securities because CCS may deduct its advisory fees directly from client accounts held at the qualified custodian. Furthermore, CCS is deemed to have custody over client funds and securities because CCS has the ability to access or control client funds or securities directly from the client's custodian account. For those accounts in which CCS has custody, the firm has established various procedures to ensure compliance with the SEC's Custody Rule. These include:

- requiring that the client direct that CCS establish an account for the client, including informing the client in writing of the qualified custodian's name, address, and the manner in which the client's funds or securities are maintained.
- CCS being subject to an annual custody examination verifying the location of client funds and securities, which is conducted on a surprise basis by an independent public accounting firm registered as a member of and subject to inspection by the Public Company Accounting and Oversight Board.

You will receive account statements as least quarterly from First Clearing. We urge clients to carefully review those statements and compare the custodial records to the other reports that may be provided to you (i.e., quarterly performance reports, annual reports, etc.)

ITEM 16 – INVESTMENT DISCRETION

In certain CCS managed programs, CCS is granted discretionary authority to select the securities to be bought and sold, the amount of securities to be bought and sold, and the time to buy and sell. When exercising this authority, CCS and Financial Professionals can place transaction orders for discretionary

CCS managed program accounts without contacting you on a trade-by-trade basis for advance permission to place the orders. You should be aware that your Financial Professional may make different recommendations and effect different trades with respect to the same securities to different advisory clients. When providing non-discretionary advisory services, CCS and your Financial Professional will be required to contact you prior to implementing trades or changes in your account. You will be required to accept or reject our investment recommendations including the security being recommended, the number of shares or units and when to buy, sell or hold. You should be advised that if CCS or your Financial Professional is unable to reach you, or you are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and CCS may not achieve the optimal trading price or strategy.

ITEM 17 – VOTING CLIENT SECURITIES

CCS does not vote proxies or consider any other corporate actions on your behalf. We shall have no obligation or authority to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held by you. You retain the authority and responsibility for, and we shall be expressly precluded from rendering any advice or taking any action with respect to, the voting of any such proxies. Your financial professional may help answer questions you have regarding proxy-voting matters in an effort to assist you in determining how to vote the proxy. However, the final decision of how to vote the proxy rests with you.

Furthermore, CCS does not advise or act for you in any legal proceedings, including class actions or bankruptcies, or notify you of such events, involving securities purchased for or held in your account. You (or your legal agent) then have the sole responsibility for taking or not taking any action regarding these legal matters.

ITEM 18 – FINANCIAL INFORMATION

CCS does not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance and is not required to include a balance sheet for the most recent fiscal year. CCS does not have any financial condition that is reasonably likely to impair its ability to meet its contracted commitment to any client.