ITEM 1 – COVER PAGE

Part 2A Appendix 1 of Form ADV: *Wrap Fee Program Brochure*

This Wrap Fee Program 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. Any reference in this Brochure to "registered investment adviser" or "registered" does not imply a certain level of skill and training.

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

Date of this Brochure: June 25, 2026

ITEM 2 – MATERIAL CHANGES

Date of Last Update: June 6, 2025 Date of this Brochure: June 25, 2026

Summary of Material Changes

The following is a summary of the material changes made to this Brochure on and since the last update.

There were no material updates to this Brochure since the last update.

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ITEM 4 – SERVICES, FEES, AND COMPENSATION

This Brochure is intended to provide you with information regarding the wrap fee programs we offer including advisory services, fees, compensation, and business practices that you should consider before opening or maintaining a wrap fee program account with our Firm.

Coordinated Capital Securities, Inc. (hereinafter "CCS" or "Firm") is a Wisconsin corporation located in Fort Atkinson, Wisconsin. CCS is a securities broker-dealer registered under the Securities Exchange Act of 1934, a member of the Financial Industry Regulatory Authority (FINRA) and a Registered Investment Adviser registered with the Securities and Exchange Commission (SEC). Only individuals who are licensed, qualified, and authorized as an investment adviser representative with CCS are permitted to offer advisory services on behalf of CCS (hereafter referred to in this disclosure as "Financial Professionals"). CCS Financial Professionals are also approved to provide brokerage services in their separate capacity as Registered Representatives of our dually registered broker-dealer. Recommendations regarding your advisory accounts 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 in what capacity 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.

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 and account-opening decisions.

We offer both Advisory and Brokerage Services. We are registered as both a broker-dealer and an investment adviser. You may purchase many of our products and services in either transaction-based brokerage account, a fee-based advisory account, or a combination of each. 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 wrap fee programs described in this Brochure is appropriate for your needs, you should bear in mind that fee-based advisory accounts, when compared with commission-based brokerage 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 for transactions under a fee-based account versus a commission-based account can vary significantly and depend upon a number of factors, including:

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

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 fee-based advisory program 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, we disclose this conflict and will also explain the advantages and disadvantages of a fee-based advisory account versus a commission-based brokerage account to you prior to opening the account.

WFA-Sponsored Programs. 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. Programs sponsored by WFA are wrap fee programs and our involvement is limited to offering and recommending these programs to clients. 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.

WFA provides advisory and other services with respect to the Personalized Unified Managed Account Program ("Personalized UMA") and FundSource Program. Please review the appropriate WFA Disclosure Documents for a complete description of these programs. You may request a copy of the WFA Disclosure Documents by contacting your Financial Professional or contacting us directly. WFA does not provide advisory services with respect to Asset Advisor, Private Advisor Network and Custom Choice, however they do provide certain non-advisory platform services which enables CCS to offer these programs. Please review the appropriate WFA Disclosure Documents and Third-Party Manager Disclosure Documents for a complete description of these programs. You may also request a copy of these Disclosure Documents by contacting your Financial Professional or contacting us directly.

Wrap Program Descriptions

The description provided in this section is intended to provide you with a summary of each Program. The fees associated with the advisory program you select will be described your advisory program agreement.

As a result of the differences in fees and other sources of compensation that exist among the various advisory programs and services we offer, CCS and your Financial Professional have a financial incentive to recommend particular wrap fee programs and services over other programs and services available through CCS.

The following table summarizes the wrap fee programs we offer.

Advisory Program	Description	Allowable Assets	Managers/Funds/ Strategies Available	Discretion/ Customization
Personal UMA	Unified managed account program based on WFA recommended single strategy or multi strategy. Custom Blends or Optimal Blends.	Separately Managed Accounts (SMA's), Mutual Funds, ETP	• Optimal Blends utilizing a combination of SMAs, mutual funds, ETP • SMA strategies including both third-party and internally managed -WFA Recommended Funds -WFA Recommended ETPs	WFA or third-party manager based on strategies selected.
Private Advisor Network (PAN)	Separately managed account, dual contract program.	Manager discretion (may include stocks, bonds, ETF's and cash alternatives.)	350 Cleared Published Strategies	Third-Party Manager (Network Manager)
Asset Adviser	Non-Discretionary (Client-Directed) investment advisory program	Stocks, Bonds, Cash Alternatives, Mutual Funds, ETPs, CDs, Options, UITs	Over 3,700 No-Load, Load Waived, Fee Based and Institutional Share Class Mutual Funds	Client-Directed
Custom Choice	Non-Discretionary (Client-Directed) mutual fund wrap program	Mutual Funds	Over 3,700 No-Load, Load Waived, Fee Based and Institutional Share Class Mutual Funds	Client-Directed
FundSource	Managed mutual fund program based on WFA driven Optimal Blends , Pathways® Blends or Customized Blends	Mutual Funds	WFA Optimal Blends and Pathways Blends, or choose from approximately 650+ WFA recommended mutual funds	Optimal Blends - WFA Pathways Blends – Russell Investments

Asset Advisor is a non-discretionary, client-directed investment program in which your Financial Professional provides investment recommendations based on your investment objectives, financial circumstances and risk tolerance. You have the option of accepting these recommendations or selecting different investments for your account. Most types of securities are eligible for purchase in an Asset Advisor account including, but not limited to, common and preferred stocks, exchange-traded products, closed end funds, fee-based unit investment trusts, corporate and government bonds, certificates of deposit, options, structured products, certain mutual funds whose shares can be purchased at net asset value, and certain wrap class alternative investments, such as hedge funds and managed futures funds. Collectively, these are referred to as "Program Assets". Certain strategies and investment products are not suitable for all investors (i.e., hedge funds are complex investment vehicles that often use leverage and other speculative investment practices, such as short sales, options, derivatives, futures and illiquid investments that may increase the risk of investment loss.) Certain assets, such as commodity futures contracts, annuities, and limited partnership interests are not eligible as Program Assets and are referred to collectively as "Excluded Assets". Some Excluded Assets may be purchased, held or sold in your account. Any transactions in Excluded Assets will incur commissions and or be subject to standard clearing transaction and other charges and fees. The advisory program fee is not charged on Excluded Assets held in Asset Adviser program account. CCS does not sponsor the Asset Adviser program. WFA provides non-advisory platform services associated with offering the program to CCS clients. You must execute the *Asset Adviser Program Agreement* to participate in this program.

Custom Choice is a non-discretionary investment advisory program designed to help you allocate

your assets among open-end mutual funds in accordance with your individual investment goals, objectives, and expectations. Based on the investment objectives and risk tolerance you provide, your Financial Professional will recommend an appropriate mix of various open-end mutual funds and money market funds. You have the option of accepting any of our recommendations or selecting an alternative combination of funds. We will implement your investment decisions, but will not have investment discretion over your account, except for the limited discretion to rebalance your target asset allocation if you authorize us to do so. You may select a quarterly, semi-annual, or annual rebalance option. CCS does not sponsor the CustomChoice program. WFA provides non-advisory platform services associated with offering the program to CCS clients. You must execute the *Custom Choice Program Agreement* to participate in this program. For additional information, please refer to the program agreement which is available through your Financial Professional or by contacting us.

FundSource/FundSource Foundation. FundSource/FundSource Foundation (hereafter FundSource) is a discretionary mutual fund wrap program based on WFA research-driven Optimal Blends or Customized Blends. Portfolios are comprised of mutual funds selected by WFA. All assets are managed by WFA who is given discretionary authority to implement changes within program accounts based on your stated investment objective and risk tolerance and other information you provided to your Financial Professional in your account profile. CCS does not sponsor the FundSource program. WFA provides advisory and other services associated with offering the program to CCS clients. You must execute the *FundSource Program Agreement* to participate in this program. For a full description of the FundSource Program please refer to the Investment Advisory Services of Wells Fargo Advisors Wrap Fee Brochure which is available through your Financial Professional or by contacting us.

Private Advisor Network (PAN) offers a roster of Private Advisor Network Managers (Network Managers), representing a broad array of investment classes and styles from which you select Network Managers to handle the day-to-day management of your account(s). Your CCS Financial Professional will assist you in allocating your assets among one or more Network Managers. Under the PAN program, you enter into a separate contract with the Network Manager that provides for the Network Manager's complete discretionary trading authority to handle the day-to-day investment selections in your account. CCS does not sponsor the PAN program. WFA provides non-advisory platform services associated with offering the program to CCS clients. Neither CCS nor WFA has discretionary trading authority with respect to PAN program accounts. For more information, please refer to the Investment Advisory Services of Wells Fargo Advisors Wrap Fee Brochure and the Network Manager's Brochure which is available through your Financial Professional or by contacting us.

Personalized UMA Program offers Personalized UMA Single Strategy Accounts or Personalized UMA Multi Strategy accounts. The program allows you to choose an Optimal Blend or a Custom Blend. Effective November 23, 2019, existing accounts in the Allocation Advisors Program, Wells Fargo Compass Program and the Masters Program, along with all Equity Strategies in the Customized Portfolios Program, were moved into the Personalized UMA Program. Allocation Advisors, Masters and Wells Fargo Compass no longer exist as stand-alone advisory Programs. In addition, Diversified Managed Allocations Program ("DMA") was renamed the Personalized Unified Managed Account Program ("Personalized UMA"). All accounts currently in these programs or strategies were moved to a Personalized UMA Single Strategy Account. Fees charged to existing accounts that are moved to Personalized UMA, along with minimum fee and minimum account size requirements specific to those accounts, will not change. Going forward, all strategies previously offered in these Programs will be

available as a Personalized UMA Single Strategy Account or as part of a Personalized UMA Multi Strategy Custom Blend account. CCS does not sponsor the Personalized UMA program. WFA provides non-advisory platform services associated with offering the program to CCS clients. For more information, please refer to the Investment Advisory Services of Wells Fargo Advisors Wrap Fee Brochure which is available through your Financial Professional or by contacting us.

Wrap Fee Program Fees

Asset Advisor

Asset Advisor accounts are charged an all-inclusive fee that covers advisory, execution, custodial, and reporting services. Billed quarterly in advance, the Standard Program fee schedule below, which is negotiable, is based on program eligible assets. The maximum annual Standard Program fee charged shall not exceed 3.0% annually. The annualized fee charged by CCS Financial Professionals in Asset Advisor accounts typically range from 1.00% to 1.5%.

Total Account Value Standard Annualized Fee

3.00%

Asset Advisor accounts that exceed 120 transactions in any one year are subject to additional standard brokerage account fees including ticket charges. Option transactions incur a separate transaction fee. Your Financial Professional may choose to pay these fees on your behalf. In this case a conflict of interest arises in that your Financial Professional may minimize transactions to avoid the additional fees. We mitigate this conflict by disclosing it to you before you open an advisory program account with us. CCS has directed First Clearing to mark-up ticket charges which CCS then receives indirectly from you. This additional compensation presents a conflict of interest because CCS receives a financial benefit if you pay these charges. 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.

FundSource

Billed quarterly in advance, the Standard Program fee schedule below, which is negotiable, is based on program eligible assets. The maximum annual Standard Program fee charged shall not exceed 2.0% annually. The annualized fee charged by CCS Financial Professionals in FundSource accounts typically range from 1.00% to 1.5%.

Total Account Value Standard Annualized Fee

2.00%

CustomChoice

Billed quarterly in advance, the Standard Program fee schedule below, which is negotiable, is based on program eligible assets. The maximum annual Standard Program fee charged shall not exceed 1.75% annually. The annualized fee charged by CCS Financial Professionals in CustomChoice accounts typically range from 1.00% to 1.5%.

Total Account Value Standard Annualized Fee

1.75%

Personalized UMA

The annualized fee charged by CCS Financial Professionals in these program accounts typically range from 1.00% to 1.5%. The maximum annual fee charged shall not exceed 2.5% annually and are negotiable. Third-party manager fees, if applicable, typically are 25 basis points (.25%) for fixed income strategies and 10-25 basis points (.10-.25%) for internally managed strategies. For custom blends, the third-party manager fee is calculated based on strategies selected. Please review the Wells Fargo Wrap Fee Brochure for Separately Managed Account Programs and applicable Third-Party Manager Disclosure Brochure for additional information.

Private Advisor Network

You have the choice of paying the PAN program fee as a percentage of the account value (advisory fee) or to incur commission charges on each trade and other standard clearing fees as applicable (execution charges). Advisory fees are generally better suited for higher trading accounts, where execution/commission charges do not apply and execution/commission charges may be better suited for lower trading accounts, where PAN accounts pay a ticket charge for every trade made. Neither the Advisory Fee Schedule nor the Execution Schedule includes the Network Manager's investment advisory fees. You pay for the services of the Network Manager separately.

- Advisory Fee Schedule. Billed quarterly in advance, the maximum annual PAN program fee, which is negotiable, is 2.0%.
- Execution Schedule. You pay for PAN services by paying execution/commission charges for each transaction in the account at our normal commission rate for such agency transactions and at the normal markup or markdown imposed on client accounts for principal transactions. You will also be subject to any other fees associated with our standard clearing transaction and other costs.

Additional Fees, Compensation and Conflicts of Interest

Wrap fee program fees are negotiable and will vary by program, the experience and standard fees charged by your CCS Financial Professional providing the service, your geographic location and other factors. A portion of the wrap fee program fees charged will be paid to CCS and to your Financial Professional in connection with the introduction of accounts, as well as for providing client-related services within the wrap fee programs.

You should be aware that the fee charged will be calculated based on eligible assets in the account including cash, money market funds and positions transferred into your program account for which you may have previously paid a commission or sales charges. Wrap fee programs typically assume a normal amount of trading activity and, therefore, under certain 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.

First Clearing charges CCS a program fee that is deducted from the wrap fee you negotiate with your Financial Professional. CCS retains a portion of the fee paid by you after payment to First

Clearing. The retained portion is additional compensation to CCS that is not shared with your Financial Professional. This additional compensation presents a conflict of interest because CCS receives this financial benefit when you open wrap-fee accounts. CCS addresses this conflict by disclosing the conflict to you before or at the time you enter into a wrap-fee program agreement with us.

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. Wrap fee 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 Share Class Selection. Many mutual funds also offer share classes that do not charge 12b-1 fees (on-going trailing commissions) 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 wrap fee program accounts we offer. 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 wrap fee 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. 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 wrap fee 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.

How you are charged Wrap Program Fees

Unless agreed upon otherwise, you authorize us to deduct a quarterly fee from the account, charged in advance of the quarter, calculated at the rate indicate in the wrap fee program agreement fee schedule signed by you. The initial program fee is calculated as of the date that the account is accepted by us into the wrap fee program and covers the remainder of the calendar quarter. Subsequent wrap fee program fees will be determined for calendar quarter periods and shall be calculated based on the account value on the last business day of the prior calendar quarter. Whenever there are changes to the fee schedule, the schedule charges previously in effect shall continue until the next billing cycle. The specific fees and way fees are calculated and charged is described in your wrap-fee program agreement. You should carefully review your agreement and this wrap brochure to understand the fees and other sources of compensation that exist among our wrap fee programs and services prior to entering into a wrap-fee program account with our firm.

Your Financial Professional may suggest that you use other products and services that CCS offers, but

that are not available through the program you select ("Excluded Assets"). Excluded Assets are not charged a program fee and are not considered a part of the program or program services. We generally recommend that you hold these Excluded Assets in a separate brokerage account. If an excluded asset purchased for or transferred into your account later becomes eligible for the program, wrap program fees as well as applicable standard clearing transaction and other fees will apply.

ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

CCS provides investment advice to individuals, pension and profit-sharing plans, trusts, estates or charitable organizations, corporations, or other business entities. The requirements for opening an account vary by the type of account you maintain and the program you select. The minimum initial account values for the wrap fee programs we offer are listed below. Under certain circumstances, the minimum account size may be waived.

The following table summarizes the minimum account size requirements for the wrap fee programs we offer:

Program	Minimum Account Size
Asset Adviser	$25,000
CustomChoice	$25,000
FundSource	$25,000 (Foundation $10,000)
Private Advisor Network	$100,000 and subject to Network Manager minimums.
Personal UMA	Multi Strategy $200,000 (Optimal Blend) $10,000 (Custom Blend) Single Strategy $10,000 (varies by strategy selected)

Termination

Your wrap fee program account agreement may be terminated by either party at any time upon notice. If you terminate your agreement, a pro-rata refund will be made, less reasonable start-up costs. You have the right, within five (5) days of execution, to terminate the program agreement without penalty. In the event of cancellation of agreement, fees previously paid pursuant to the agreement fee schedule will be refunded on a pro rata basis, as of the date notice of such cancellation is received by the non-cancelling party, less reasonable start-up costs. At termination, you can instruct CCS to either liquidate positions in your program account, transition account positions to a commission-based brokerage 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 any standard brokerage account fees for positions sold in your program account or transferred to another financial institution after 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 wrap fee program accounts are available in a commission-based brokerage account. Eligibility is determined by the Fund company or custodian not CCS.

ITEM 6 - PORTFOLIO MANAGER SELECTION AND EVALUATION

Advisory Services Tailored to Client's Individualized Needs. Our services are always provided based on the individual needs of each individual 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.

Portfolio Managers. Neither CCS nor our Financial Professionals act as a Portfolio Manager for the wrap fee programs described in this Brochure. The services WFA and other third-party managers provide (including methods of analysis and investment strategies) is described for each program below.

- **Asset Adviser.** Your Financial Professional will provide non-discretionary (client-directed) investment management based on your disclosed investment objectives, overall financial situation, personal and financial goals, risk tolerance, investment knowledge, net worth, income, age, and other factors. You must approve each securities or cash transaction. WFA has the right to add or remove mutual funds from its roster of available mutual funds in Asset Advisor, as they deem appropriate.
- **Custom Choice**. Your Financial Professional, based on your disclosed financial goals, circumstances, risk tolerance and other factors, will provide you with recommendations of investments in mutual funds available in the CustomChoice program. CustomChoice is non-discretionary and your Financial Professional will implement your investment decisions in your account. Your Financial Professional, or WFA on our behalf, will implement the auto rebalancing service if authorized by you. WFA has the right to add or remove mutual funds from its roster of available mutual funds in Custom Choice, as they deem appropriate.
- **FundSource**. Your Financial Professional, based on your disclosed financial goals, circumstances, risk tolerance and other factors, will assist you in selecting from a universe of Recommended and Pathways mutual funds evaluated by WFA, or in the case of Pathways blends, Russell Investments. WFA and Russell Investments have created a number of Optimal Blends that represent certain mutual funds and target allocations with various investment strategies based on your investment objectives. WFA reserves the right to remove and replace, without your consent, any FundSource fund selected by you if such fund is removed from the FundSource roster of available mutual funds. You may also choose to create your own Customized Blend and target allocation by selecting from the list of available mutual funds based on the recommendations made by your Financial Professional. For both Optimal Blends and Customized Blends WFA (or Russell Investments) may, in its discretion, add, remove or replace FundSource available funds and/or targeted allocations. Your Financial Professional, or WFA on our behalf, will implement the auto rebalancing service if authorized by you.

- **Personalized UMA.** Your Financial Professional will review your investment objectives, and assist you in selecting investments from a list of WFA-evaluated and recommended affiliated and non-affiliated investment adviser managers (each a "Manager"), mutual funds and ETF's ("Funds"), and/or a compatible portfolio under FundSource, Wells Fargo Compass, or Allocation Advisors suite of investment strategies that WFA provides to CCS (each a "Portfolio"). In certain cases, Managers will manage your account on a discretionary basis. In other cases, WFA will manage your account or allocation on a discretionary basis as to the securities and other investments to be purchased and sold for a particular strategy. WFA has a review and selection process for selecting managers to be included in this program Please review the Wells Fargo Wrap Fee Brochure for Separately Managed Account Programs for additional information.
- **Private Advisor Network (PAN).** Your Financial Professional will assist you in selecting an independent investment adviser (Network Manager) based on your investment objectives and account profile. You will enter into a separate contract with the Network Manager which will describe the Network Manager's handling of day-to-day investment selections for your program account. WFA has a review and selection process for selecting Network Managers to be included in this program Please review the Wells Fargo Wrap Fee Brochure for Separately Managed Account Programs for additional information.

Performance-Based Fees and 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.

Risk of Loss. In choosing any advisory services through us, you should be aware that all investments are exclusively at your risk. It is important to understand that **we do not guarantee any return** on the investments recommended or advice given. There is no guarantee that the advisory services provided by us will result in meeting your goals and objectives. Investing involves risks, including the risk of loss of principal, and 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.

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. Relative to mutual fund holdings, in most cases, the mutual fund manager, will vote your proxies. You can obtain a copy of your mutual fund's proxy voting policies online through the fund company website, or by reviewing fund documents filed with the SEC at www.sec.gov

ITEM 7- CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

Prior to opening a wrap fee program account, you will be required to complete an account profile with

the assistance of your Financial Professional. Your account profile outlines your investment objectives, financial circumstances, risk tolerance and any restrictions you may wish to impose on your investment activities. The personal information you provide CCS, including, without limitation, your social security number, net worth, annual income, etc., is protected in accordance with our privacy policy, which is available on our website http://www.ccsmadison.com/#disclosures or you may request a copy from CCS or your Financial Professional. You agree to inform your Financial Professional, preferably in writing, of any material change in the information you provided in your account profile, that might affect the manner in which your assets should be invested or managed.

ITEM 8 - CLIENT CONTACT WITH PORTFOLIO MANAGERS

Your contact for information and consultation regarding your wrap fee program account is your Financial Professional. In certain instances, your Financial Professional may coordinate a response with the Portfolio Manager (if applicable) or arrange for you to consult directly with the Portfolio Manager.

ITEM 9 – ADDITIONAL INFORMATION

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. Clients enrolled in wrap fee programs described in this Brochure were not affected by the Order.

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.

Other Financial Industry Activities and Affiliations. 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 the 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. CCS is also affiliated with Coordinated Capital Consultants (CCC), an insurance general agency under common ownership with CCS.

CCS Financial Professionals are also Registered Representatives of CCS, in its capacity as a broker/dealer. Some of our Financial Professionals are also insurance agents of CCC and some Financial Professionals are independently licensed as insurance agents. In their separate capacities as Registered Representatives and/or insurance agents, these individuals are able to effect securities transactions and/or purchase insurance and insurance-related investment products for CCS clients and will receive separate and additional compensation. You are under no obligation to engage CCS Registered Representatives and/or insurance agents when considering the purchase or sale of securities or insurance. The implementation of any or all recommendations is solely at your discretion. You should be aware that the receipt of this additional compensation creates a conflict of interest as it gives the CCS Registered Representative and/or insurance agent an incentive to recommend investment and/or insurance products based on the compensation received, rather than on your needs. This conflict is mitigated through disclosure to you and by maintaining supervisory procedures through which we oversee the execution of Financial Professional's recommendations in the wrap fee programs we offer.

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 wrap 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, a copy will be provided promptly upon request by contacting us at 800-783-6666.

Account Reviews. 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 Professionals offer to provide an annual financial review to every client, and CCS 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. Your Financial Professional is responsible for performing 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.

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 a report that compiles or consolidates investment holdings and/or performance results.

Client Referrals and Other Compensation. From time-to-time CCS enters into agreements with individuals or firms ("Solicitors") providing payment of a portion of the advisory fee for the promotion of our investment advisory services to qualified prospects. 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 receive a percentage of the advisory fee you pay us and therefore have a financial interest in referring clients to CCS. Because Solicitors will, under such arrangements, be compensated for referring clients to CCS, there is an inherent conflict of interest in that Solicitors may refer potential clients for the sole purpose of receiving a referral fee. No additional fees are assessed when clients are referred to our Firm. You should be aware that just because a referral is made, it does not imply that an investment advisory account is appropriate for you. This conflict of interest is mitigated by disclosing it to you, and we review all new advisory accounts for appropriateness and suitability before they are opened. 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.

Financial Information. CCS is required to provide you with certain financial information or disclosure about our financial condition. CCS has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding. CCS does not require or solicit prepayment of more than $1,200 in fees per clients more than six months in advance. Therefore, we are not required to include a financial statement with this Brochure.

Business Continuity Plan. CCS has established a Business Continuity Plan (BCP). Our 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.