Firm Brochure

Form ADV Part 2A

This brochure provides information about the qualifications and business practices of CCM Investment Management, LLC. If you have any questions about the contents of this brochure, please contact us at (774) 226-8765 or by email at: contact@ccm.investments. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about CCM Investment Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

CCM Investment Management, LLC's CRD number is: 290483.

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

CCM
INVESTMENT MANAGEMENT

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Version: 3/18/2024

Item 2: Material Changes

The following material changes have been made since the last filing on 3/6/2023.

1. none

Item 3: Table of Contents

Item 4: Advisory Business

A. Description of the Advisory Firm

CCM Investment Management, LLC (hereinafter "CCMIM") is a Limited Liability Company organized in the State of Massachusetts. The firm was formed in September 2017, and the principal owner is Chad Mello.

B. Types of Advisory Services

Portfolio Management Services

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

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

CCMIM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. CCMIM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

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

Financial Planning

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

Services Limited to Specific Types of Investments

CCMIM generally limits its investment advice to fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, non-U.S. securities and private placements. CCMIM may use other securities as well to help diversify a portfolio when applicable. In terms of analyzing the portfolio and communicating with clients, CCMIM will assess the portfolio as a whole rather than focusing solely on a specific exposure (e.g., non-U.S.) or type of security (e.g., ETFs). CCMIM believes this holistic view is the right approach for both for the portfolio itself and for client communications.

C. Client Tailored Services and Client Imposed Restrictions

CCMIM will tailor a program for each individual client based on the client's personal restrictions, needs, and targets. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by CCMIM on behalf of the client. CCMIM will provide a specific, tailored set of recommendations for each client, typically a combination between (i) providing investment recommendations for a portion of the portfolio outside of any model portfolios and (ii) allocating a portion of the portfolio across multiple models. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CCMIM from properly servicing the client account, or if the restrictions would require CCMIM to deviate from its standard suite of services, CCMIM reserves the right to end the relationship.

D. Wrap-Fee Programs

CCMIM participates in wrap-fee programs, which are investment programs where the investor pays one stated fee that includes management fees, transaction costs, and other administrative fees. CCMIM manages the investments in the wrap-fee program. CCMIM may manage those wrap-fee accounts differently than non-wrap-fee accounts depending on the investment vehicles chosen. A portion of fees paid under this program are paid to CCMIM as a management fee and a portion are paid to the custodian as described in the wrap-fee brochure. CCMIM's participation in the wrap-fee program can be located in Appendix 1 of the Form ADV

E. Assets Under Management

CCMIM has the following assets under management as of December 31, 2023: Discretionary Amounts $15819793 and Non-Discretionary Amounts $72434.

Item 5: Fees and Compensation

A. Fees

CCMIM is compensated for its advisory services through asset-based portfolio management fees and fees for stand-alone financial planning services.

Portfolio Management Fees

Each client account is billed separately. Maximum annual fees are listed in the Schedule of Fees below. Fees are generally negotiable and the final Schedule of Fees is included in the Investment Advisory Contract and any appendixes or related documents. Depending on the custodian and/or investment vehicle chosen, clients may have the ability to have CCMIM calculate and deduct asset-based portfolio management fees directly from the client account or have the fees calculated, deducted and remitted to CCMIM from the account by the custodian or other third-party.

Schedule of Fees

Account Value	Annual Fee Rates
$0 - $50,000	1.45%
$50,000.01 - $250,000	1.30%
$250,000.01 - $500,000	1.15%
$500,000.01 - $1,000,000	0.95%
$1,000,000.01 - $2,000,000	0.75%
$2,000,000.01 - $5,000,000	0.60%
$5,000,000.01 – And Up	0.45%

The annual fee is calculated on a tiered basis, which means that each dollar is billed at the respective account value breakpoint contained in the Schedule of Fees. The fees at each breakpoint are then combined to arrive at the total fee.

Clients may terminate any Investment Advisory Contract without penalty for a full refund of CCMIM's fees within five business days of signing. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Financial Planning Fees

The negotiated hourly fee for these services is $150. Clients may terminate the agreement without penalty, for full refund of CCMIM’s fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Fees Calculated and Deducted by CCMIM

Asset-based portfolio management fees calculated by CCMIM are withdrawn directly from the clients’ accounts on a monthly basis. Fees are paid in advance.

Fees for full billing months are calculated using the account value at the close of the last business day of the prior billing month. The monthly fee at each breakpoint equals the annual fee rate divided by twelve, multiplied by the account value.

New or terminated Investment Advisory Contracts may result in partial billing months. These fees are calculated on a prorated basis. During any billing month deposits or withdrawals, other than those described below for partial billing months, will not result in prorated fees.

Prorated fees for new Investment Advisory Contracts are calculated using the account value at the close of the initial day that a participating account has a balance. The fee at each breakpoint equals the annual fee rate divided by twelve, multiplied by the number of days remaining in the billing month after the inception date divided by the total number of days in the billing month, multiplied by the account value.

Fees Calculated and Deducted by Custodian or Third-Party

The full billing methodology used by the custodian or third-party may be contained in the agreements between the client and the custodian or third-party. The billing methodology employed by the custodian or third-party chosen may be different from the methodology used when fees are calculated by CCMIM. The Investment Advisory Contract will contain the Schedule of Fees and a description of the billing methodology used by the custodian or third-party. CCMIM will not have the ability to determine the fee amount or direct the deducting of fees. The client will instruct the custodian or third-party regarding its obligation to calculate the fees according to the terms of the Investment Advisory Contract.

Payment of Financial Planning Fees

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

C. Client Responsibility For Third-Party Fees

This brochure describes CCMIM's non-wrap-fee advisory services. Clients utilizing CCMIM's wrap-fee portfolio management should see the separate Wrap-Fee Program Brochure for additional details regarding third-party fees. Client accounts not participating in the wrap-fee program are responsible for the payment of all third-party fees. These fees are separate and distinct from the fees and expenses charged by CCMIM. The fees include, but are not limited to, transaction and trading fees, custody fees, annual IRA fees paid to the custodian, transition fees when moving an account, margin costs, charges imposed directly by a mutual funds or exchange traded funds, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

CCMIM may collect fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

Prorated fee refunds for terminated Investment Advisory Contracts equal the fee paid in advance for the billing period multiplied by, the number of days remaining in the billing period after termination divided by the number of total days in the billing period.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

E. Compensation For the Sale of Securities or Investment Products

CCMIM and its supervised persons may accept compensation for the sale of non-variable life insurance, non-variable annuities and other life/health insurance products. Compensation is not accepted for asset-based sales charges or service fees from the sale of mutual funds, variable insurance products, or other securities. Conflicts of interest may arise when receiving commissions for the recommendation of insurance products. This practice potentially gives CCMIM and its supervised persons an incentive to recommend products based on the compensation received, rather than on a client's needs. CCMIM does not charge asset-based advisory fees on non-variable insurance products that CCMIM may recommend and receive commissions for. However, if a client has engaged CCMIM to provide financial planning services for a fee, CCMIM and/or its representatives may also receive compensation for recommending non-variable insurance products as part of the financial planning process.

Insurance products recommended by CCMIM are non-exclusive and are available for purchase through insurance brokers not affiliated with CCMIM.

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

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

Item 7: Types of Clients

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

- Individuals
- High-Net-Worth Individuals
- Corporations or Business Entities

There is an account minimum of $100,000, which may be waived by CCMIM in its discretion.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

CCMIM's methods of analysis include Cyclical analysis, Fundamental analysis, Modern portfolio theory and Quantitative analysis.

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

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

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

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

Investment Strategies

Clients who seek management of their investment portfolio will typically be advised to invest in a strategic asset allocation (SAA) that aims to meet the particular client's required return, willingness to take risk, time horizon, and complement the variability/reliability of their income sources. As discussed in Items 4 and 10, CCMIM's portfolio management also includes the use of investment models offered by third-parties. Specifically, SAAs are primarily constructed through the use of academic models that consider long-term capital market expectations and are implemented through a mainly passive investing approach. Periodic rebalancing of the SAA aims to create a consistent portfolio risk profile and thus CCMIM uses long term trading and short term trading. For accounts that are not limited in terms of tax concerns and portfolio turn-over, quantitatively based, tactical, active management may be used to seek enhanced performance above the passive SAA recommendation.

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

B. Material Risks Involved

Methods of Analysis

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

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

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

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

Investment Strategies

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

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Use of multiple models has the benefit of allowing diversification of both securities and investment approaches. Risks of third-party models include, inter alia, the possibility of flawed assumptions, the possibility of flawed inputs/data, and limited ability to monitor the model provider as closely as an investment adviser manages its own firm. However, CCMIM attempts to mitigate these risks by comparing models to similar cohorts of models, rebalancing on a periodic basis, and allocating portions of a given client portfolio across different models (and its own direct management).

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

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

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

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Because ETFs use "authorized participants" (APs) as agents to facilitate creations or redemptions (primary market), there is a risk that an AP decides to no longer participate for a particular ETF; however, that risk is mitigated by the fact that other APs can step in to fill the vacancy of the withdrawing AP [an ETF typically has multiple APs] and ETF transactions predominantly take place in the secondary market without need for an AP. Like other liquid securities, ETF pricing changes throughout the trading day and there can be no guarantee that an ETF is purchased at the optimal time in terms of market movements. Moreover, due to market fluctuations, ETF brokerage costs, differing demand and characteristics of underlying securities, and other factors, the price of an ETF can be lower that the aggregate market price of its cash and component individual securities (net asset value – NAV). An ETF is subject to the same market risks as those of its underlying individual securities, and also has internal expenses that can lower investment returns. Leveraged ETFs and inverse ETFs are not used. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. CCM model portfolios will generally contain 0% weighting toward gold and/or precious metal ETFs, however, CCM model portfolios may contain a maximum weighting of approximately 2% of gold and/or precious metal ETFs.

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

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

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

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

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

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

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

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

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

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

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

CCMIM will evaluate and may employ investment models provided by unaffiliated third-party “model managers” as part of its portfolio management process. If CCMIM does invest using a third-party model, the model manager will have no knowledge or relationship with the individual clients; instead CCMIM will allocate across models as needed in light of the client’s goals for the portfolio as a whole. Moreover, no additional fees will be charged to the client for the use of investment models.

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

A. Code of Ethics

CCMIM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. CCMIM's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

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

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

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

Item 12: Brokerage Practices

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

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

The custodian for CCMIM's wrap-fee portfolio management is FOLIOfn Investments, Inc. and therefore clients in the wrap-fee program will be required to use FOLIOfn. CCMIM has chosen FOLIOfn based on the factors listed above.

For non-wrap-fee advisory services, CCMIM will not recommend any specific custodian. Rather, it will work with the client's preferred custodian(s).

Research and Other Soft-Dollar Benefits

While CCMIM has no formal soft dollars program in which soft dollars are used to pay for third-party services, CCMIM may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft dollar benefits”). CCMIM may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and CCMIM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. CCMIM benefits by not having to produce or pay for the research, products or services, and CCMIM will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that CCMIM’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

Brokerage for Client Referrals

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

Clients Directing Which Broker/Dealer/Custodian to Use

For wrap-fee accounts, CCMIM will require clients to use a specific broker-dealer (FOLIOfn) to execute transactions. Not all advisers require clients to use a particular broker-dealer.

For non-wrap-fee accounts, CCMIM permits clients to direct it to execute transactions through a broker-dealer of the client’s choosing. If a client directs brokerage, the client will be required to acknowledge in writing that the client’s direction with respect to the use of brokers supersedes any authority granted to CCMIM to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts, and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

CCMIM does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews

All client accounts for CCMIM's advisory services provided on an ongoing basis, are reviewed with regard to clients’ respective investment policies and risk tolerance levels at least annually by Chad Mello, CCO and your CCMIM representative.

All financial planning accounts are reviewed upon financial plan creation and plan delivery. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

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

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

With respect to financial plans, CCMIM’s services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of CCMIM's advisory services provided on an ongoing basis will receive periodic reports detailing the client’s account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

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

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by third-parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

CCMIM does not receive any economic benefit, directly or indirectly from any third-party for advice rendered to CCMIM's clients.

B. Compensation to Non–Advisory Personnel for Client Referrals

CCMIM compensates certain personnel known as S*olicitors* for client referrals. Solicitors may be required to register as an Investment Adviser Representative of CCMIM, however, Solicitors are not permitted to provide investment advice nor do they engage in the operations of CCMIM. For each client of CCMIM that was introduced through the efforts of a Solicitor, CCMIM will pay to the Solicitor a portion of the advisory fee received by CCMIM. CCMIM does not charge higher fees to clients that were referred through a Solicitor. A Solicitor Disclosure Statement will be provided to clients upon the initial solicitation that outlines the agreement by and between the Solicitor and CCMIM.

Lead generation, referral and solicitation arrangements give rise to conflicts of interests because the referring party has a financial incentive to introduce new investment advisory clients to CCMIM. CCMIM’s participation in these referral arrangements does not diminish its fiduciary obligations to its clients.

Item 15: Custody

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

Item 16: Investment Discretion

CCMIM provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, CCMIM generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. Please see item 4.C regarding imposing restrictions.

Item 17: Voting Client Securities (Proxy Voting)

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

Item 18: Financial Information

A. Balance Sheet

CCMIM neither requires nor solicits prepayment of more than $500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

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

C. Bankruptcy Petitions in Previous Ten Years

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

Item 19: Requirements For State Registered Advisers

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

CCMIM currently has only one management person: Chad Mello. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

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

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

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

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no arbitration awards to report under this section.

There are no civil, self-regulatory organizations, or administrative proceedings to report under this section.

Clients can obtain the disciplinary history, if any, of CCMIM and its representatives from the Massachusetts Securities Division upon request.

E. Material Relationships That Management Persons Have With

Neither CCMIM or its management personnel have any relationships or arrangements with issuers of securities that are not already listed in Item 10.C.