BROCHURE
(Form ADV Part 2A)

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March 30, 2021

This brochure ("Brochure") provides you with information about the qualifications and business practices of Chancellor Wealth Management, Inc. It contains information that you should consider before becoming a client of our firm. If you have any questions about the contents of this Brochure, please email or call the contact person listed above.

The information contained herein has not been approved or verified by any governmental authority. Our firm is an investment advisory firm registered pursuant to the laws of the State of Georgia. Registration of an investment advisor does not imply a certain level of skill or training. We have only filed the requisite registration documents in the proper jurisdictions and with the respective governmental entities.

Additional information about Chancellor Wealth Management, Inc. can be found on the Investment Adviser Public Disclosure Website at www.adviserinfo.sec.gov. Chancellor Wealth Management, Inc. CRD/IARD No. is 112918.

The Brochure supplements for our firm's investment advisor representatives begin after page 15, and this document is not complete without a brochure supplement.

MATERIAL CHANGES (Item 2)

Chancellor Wealth Management Material Changes

This version of our Brochure, dated March 30, 2021, is an annual amendment. The following are the material changes to our business practices since the last filing in March of 2020:

Advisory Services (Item 4)
Assets under Management
We have updated our asset under management figure as required by regulations. We currently* manage a total of $84,407,515 in client assets; $71,526,865 is managed on a discretionary basis and $12,880,650 on a non-discretionary basis. *Our asset under management calculations are as of December 31, 2020.

Fees and Compensation (Item 5)
Fees for Investment Management Services
Effective March 30, 2021, our fee schedule for investment management services has changed. The new fee schedule is as follows:

Assets Under Management	Annual Fee
$100,000 - $500,000	1.50%
$500,001 - $750,000	1.25%
$750,001 - $2,000,000	1.00%
$2,000,001 - $5,000,000	.80%
$5,000,001 and above	.60%

General (non-material) Revisions
We have revised some information or included additional language to ensure that our disclosures are concise and unambiguous.

Full Brochure Available

The foregoing is a summary of material changes in the annual amendment to our Brochure. If you have any questions about our annual updates or would like a full copy of our Brochure, please contact us by telephone (770) 661-0283 or email: vince@chancellorwealth.com.

Please also note that additional information about Chancellor Wealth Management, Inc. can be found on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Chancellor Wealth Management CRD/IARD No. is 112918.

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ADVISORY SERVICES (Item 4)

About Our Business

Chancellor Wealth Management, Inc. (also referred to herein as "we," "us," or "our") formerly known as The Chancellor Group, Inc., is a wealth management company that provides financial planning and investment management services. Our firm is a Georgia domiciled corporation located in Atlanta, Georgia. We have been providing advice to our clients since 2002. We conduct business in the states of Georgia, South Carolina, and Texas.

The corporate principals of our firm are Mr. Herschel Vincent (Vince) Clanton, President, and Mr. Scott Taylor Clanton, Vice President. Vince Clanton and Scott Clanton are the firm's investment advisor representatives. Mr. Vince Clanton is our firm's chief compliance officer.

Types of Advisory Services

Our firm provides comprehensive financial planning and investment management services to individuals and high net worth individuals. We assist clients in planning for their financial future and growing their investments. A detailed explanation of our services is as follows:

1. Financial Planning Services

We provide modular and comprehensive financial planning services. Client data is evaluated thoroughly to formulate comprehensive financial plans (long-term goals) or plans for specific financial planning events (short-term goals). Our plans may include information relative to retirement planning, advanced education planning, college planning, or plans for major purchases, as well as life, health, disability, and long-term care insurance needs.

Our financial planning advice will typically involve providing a variety of services, principally advisory in nature, regarding managing a client's financial resources based upon an analysis of each client's individual needs. We conduct a complimentary initial consultation to collect pertinent information about a client's financial circumstances, goals, and objectives. The information collected typically covers current (and anticipated) assets and liabilities, including savings, investments, anticipated retirement, or other employment benefits and insurance. Our financial planning process involves the organization and assessment of all relevant data and the identification of financial goals and objectives. The primary objective of this process is to allow our firm to assist clients in developing a strategy for the successful management of income, assets, and liabilities in meeting financial goals and objectives. Once such information has been reviewed and analyzed, a written financial plan designed to achieve a client's stated financial goals and objectives will be prepared and presented.

The written financial plan generally includes recommendations for a course of activity or specific actions. For example, we may recommend that a client establishes an individual retirement account, increase or decrease funds in savings, invest funds in securities, obtain insurance, or revise existing coverage. We may develop or include tax and estate planning matters or make a referral to an accountant or attorney for other professional services. Clients are responsible for engaging these professionals directly on an as-needed basis.

Financial plans are prepared based on information a client provides about his/her particular financial situation. It is a client's responsibility to notify us promptly if there are changes in the noted financial situation, needs, goals, or objectives.

We will not be responsible for implementing any recommendations in the written financial plan prepared by our firm or supervising the implementation of such recommendations unless a client enters into a separate agreement for investment management services.

Please note that clients are not obligated to implement our financial planning recommendations. Moreover, if a client elects to implement our financial planning advice, there is no obligation to implement the recommendations through our firm. Clients may implement recommendations with any professional advisor.

Clients who agree to enter into a separate engagement for investment management services are advised that our receipt of fees for financial planning services and investment management services create conflicts of interest due to receipt of fees for both advisory services.

We mitigate the conflicts of interest associated with our firm receiving advisory fees for financial planning and investment management services by reducing the financial planning fee to a fixed fee of $500 if our firm is engaged for investment management services.

2. Investment Management Services

We provide discretionary investment management services to meet a client's financial goals and investment objectives. If retained for investment management services, we meet with our clients to gather additional information regarding specific investment goals, objectives, time horizon, risk tolerance, and other relevant suitability information. We will use the information gathered to develop a strategy that enables our firm to provide continuous and focused investment advice. Upon implementing investment management services and determining personalized asset allocations, we typically recommend constructing a client's portfolio holdings using mutual funds and exchange-traded funds. After implementing the investment plan, we monitor the performance of our client's portfolio(s) on an on-going basis.

3. Retirement Plan Advisory Services

We provide ERISA non-fiduciary plan ("Plan") consulting services to plan participants. Our services generally consist of educational services that assist retirement plan participants in understanding investment options offered by the Plan. We also provide education regarding the selection and allocation of the retirement plan's available investment options. Our services also include general assistance with group enrollment meetings and fee and expense evaluations for plan participants.

Tailored Services

Our advice and services are based on the individual needs of a client after analyzing and thoroughly evaluating the client's goals, objectives, investment horizon, and risk tolerance. Clients may impose restrictions on investing in certain asset classes or specific types of securities by advising their investment advisor representative of such limitations.

Wrap Fee Programs

We are not a participant in any wrap fee program.

Assets under Management

We currently* manage a total of $84,407,515 in client assets; $71,526,865 is managed on a discretionary basis and $12,880,650 on a non-discretionary basis. *Our asset under management calculations are as of December 31, 2020.

FEES AND COMPENSATION (Item 5)

Advisory Fees

We earn fees and compensation by providing financial planning and investment management services. Our fees for services are as follows:

1. Fees for Financial Planning Services

Our initial consultation for financial planning services is complimentary. Our hourly and fixed fees are as indicated below:

(a) Hourly Fees

If, after the complimentary session, a client chooses to have us prepare a written financial plan, our hourly rate of $200 will apply. The average financial plan takes approximately fifteen (15) hours to complete and costs $3,000. The final planning fee shall be directly dependent upon the complexity of a client's financial situation and the details required for the financial plan. We will sign an agreement identifying a "not to exceed" fee for the financial plan. Upon execution of our agreement, clients pay $500 of the estimated fee as a deposit, and the remaining balance is due when we present the planning recommendations. Our hourly fees are non-negotiable, and the first payment is non-refundable after five (5) business days of signing our financial planning agreement.

(b) Fixed Fees

If we present the written financial plan and a client chooses to use our investment management services to implement the financial plan, we will reduce the fee for financial planning services to a fixed fee of $500. Please note that our fixed fees are non-negotiable.

2. Fees for Investment Management Services

Our fee schedule for investment management services is as follows:

Assets Under Management	Annual Fee
$100,000 - $500,000	1.50%
$500,001 - $750,000	1.25%
$750,001 - $2,000,000	1.00%

$2,000,001 - $5,000,000	.80%
$5,000,001 and above	.60%

Sample Fee Calculation
Value of Investment $2,275,000
$2,275,000 @ .008
Annual Fee of $18,200 or Quarterly Fee $4,550

Our fee schedule for investment management services is non-negotiable; the final fee is outlined in our investment advisory agreement. Notwithstanding the foregoing, we reserve the right to assess a lesser investment management fee based upon certain criteria (e.g., the anticipation of additional assets, the dollar amount of assets to be managed, related accounts, account composition, specific memberships, and affiliations, etc.) that we deem pertinent. Accordingly, some client relationships may exist where advisory fees are lower than the stated fee schedule.

3. Retirement Plan Advisory Services
Our fees for retirement plan consulting services are assessed at an annual rate of up to 1%. The fees are based on a percentage of the market value of includable retirement plan assets. Our fees for retirement plan advisory services are negotiable.

Billing Procedures

Our specific billing procedures are as follows:

1. Billing for Financial Planning Services
Clients will pay the $500 deposit by check at the time of signing the financial planning agreement. The remaining balance is due upon delivery of the written financial plan or recommendations and is generally paid by check.

More importantly, clients who elect to use our firm to implement the financial plan (i.e., utilize our investment management services) will only incur a fixed fee of $500 for preparing the financial plan. That is, after making the initial deposit for financial planning services, no additional fees are due.

2. Billing for Investment Management Services
Advisory fees for investment management services are billed and payable quarterly in advance (i.e., at the beginning of each calendar quarter). Accordingly, we transmit our advisory fee calculations electronically to the account custodian on or shortly after the beginning of each calendar quarter. Advisory fees due for any period of less than one calendar quarter shall be calculated based on the number of days remaining in the quarter as of the day the assets are transferred or deposited into the account. Fee assessments are based on the value of the investment assets and cash equivalent positions as of the close of trading on a national securities exchange, the principal market where securities are traded, or the most recent appropriate fair market quotation as supplied by the account custodian or clearing broker as of the last day of the previous calendar quarter. Also, billing valuations for fixed income securities often include accrued interest. Further, no fee adjustments will be made for additional deposits or partial withdrawals during any quarter. For billing purposes, we use the aggregate value of all accounts for each client (i.e., household) unless directed otherwise.

Our advisory fees are generally deducted directly from the account(s) specified by the client by agreement and a client's written authorization incorporated in our investment management agreement. In instances of direct fee deduction, an advisory fee recap is sent to the client and account custodian. On the other hand, if a client has agreed to pay advisory fees by check, payments are due within thirty (30) days of receipt of our invoice. Please note that clients are responsible for verifying the accuracy of the advisory fee calculations. All fees are subject to review and revision at any time. Clients will receive advance notice of any fee change effectiveness.

3. Billing for Retirement Plan Advisory Services
Our fees for retirement plan advisory services are billed and due quarterly in advance. Plan sponsors generally provide written authorization for our advisory fees to be deducted directly from the plan assets for direct remittance to our firm.

Other Fees & Expenses

Clients will also incur additional third-party fees and expenses ("third party fees") related to the management of investments and advisory service provisions. These fees may include but are not limited to no-load mutual fund ticket charges, brokerage transaction costs, deferred sales charges on previously purchased mutual funds, IRA maintenance fees, and other legal or transfer fees. The account custodians, broker-dealers, mutual fund companies, and others who provide account services charge these fees, and clients are responsible for payment of all third-party fees and expenses.

As of the date of this Brochure, our account custodian does not assess transaction costs for trades in equity securities (i.e., stocks, exchange-traded funds, etc.). Also, clients whose assets are invested in mutual funds, exchange-traded funds, money market mutual funds, and other investment company securities will incur additional expenses. These are direct internal expenses of the investment company that issues the security but a cost borne by investors (clients). The specific fees and expenses are outlined in the prospectus for each investment company security.

It is important to note that the advisory fees paid to our firm are separate from the maintenance fees and transaction expenses charged by these third parties. *Please also refer to Item 12, Brokerage Practices, for more information regarding our account custodian.*

Refund Policy

Clients who do not receive this Brochure at least forty-eight (48) hours in advance of signing our advisory agreement are afforded the right to terminate their agreement within five (5) business days, without penalty. Upon expiration of the five (5) business day period, either party may terminate our advisory agreements at any time by providing thirty (30) days advance written notice to the other party.

Upon receiving a client's termination request, we will assess fees pro-rata up to the date of termination. We will refund any unearned portion of prepaid fees within fourteen (14) business days. If applicable, we will collect any unpaid advisory fees due to us prior to the disbursement of a refund. If we are unable to deduct final advisory fees from a client's account(s), such as in the case of an account transfer, we will transmit a final advisory fee invoice to the client, which is due upon receipt. Clients pay final advisory fee invoices by mailing a check to our address.

Other Compensation

Neither our firm nor investment advisor representatives accept any compensation for the sale of securities. Our investment advisor representatives are not registered in any securities sales capacity.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT (Item 6)

We do not charge performance-based fees or conduct side-by-side investment management services.

TYPES OF CLIENTS (Item 7)

We generally provide advice to individuals and high net-worth individuals.

Our firm requires a minimum account value of $100,000 but will accept accounts of lesser value. However, please be advised that accounts of smaller value are more difficult to diversify and rebalance and may not experience the same performance as accounts valued at $100,000 or more.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS (Item 8)

Methods of Analysis and Investment Strategies

We utilize the risk tolerance module of our financial planning software, MoneyguidePro, a division of Envestnet, to obtain risk tolerance data and the suggested model portfolios generated based on a client's response to our inquiries. The questionnaire is designed for discerning a client's maximum tolerance for risk. MoneyguidePro analyzes mutual funds using a return-based approach to determine the representative composition of funds by individual asset class. MoneyguidePro also assigns an appropriate asset class to individual stocks. Once a client's maximum risk tolerance profile has been established, we discuss model portfolios that may be suitable. Each model recommends a fixed income to equity ratio of assets for a client's account(s). Each of the portfolios identifies multiple domestic and global market sectors. Asset allocation is a key component of investment portfolio design. We believe that the appropriate allocation of assets across diverse investment categories (stock vs. bond, foreign vs. domestic, large-cap vs. small-cap, high quality vs. high yield) is a major determinant of portfolio returns and critical to the long-term success of any client's financial objectives.

Clients may impose restrictions; however, restrictions and stringent guidelines may affect the composition of portfolios. Our services do not encompass traditional buy and hold stock strategies, but clients may direct that a particular security be purchased or held in the account(s). We will accommodate such requests without taking responsibility for the performance of that security.

One of the most important criteria that we analyze is the cost-effectiveness of the underlying investments in the portfolio. During the selection process, we consider the fees and any other expenses of actively and passively managed mutual funds that could affect returns. In addition to preferring mutual funds with lower fees, we evaluate mutual funds for risk and return over varying periods against comparable funds through the use of Investment View Plus by Refinitiv.

Once a portfolio has been fully invested, we will generally remain invested at all times, as we believe that market timing does not add value to the investment management process. We will generally manage low turnover portfolios. We believe that frequent trading will produce negative results due to high transaction costs and adverse realization of gains or losses. We utilize the discipline of rebalancing portfolios as market results create portfolios that are inconsistent with the asset allocation of the model portfolio. Additionally, any significant future cash inflows will be invested in the portfolio over a period of six to ten months.

Material Risks of Methods of Analysis and Investment Strategies

We utilize conventional analysis methods and investment strategies, but even so, there remains some level of material risk. Performance and capital preservation are not guaranteed; changing market conditions create the necessity to re-evaluate each position held in the portfolio continuously. Actively managed mutual funds will be assessed periodically against other comparable funds. A pattern of poor performance over time will result in the mutual fund being eliminated from our strategy.

Clients should be aware that all securities and investment strategies have various types of risks. While it is impossible to name all potential risks associated with our specific methods of analysis and investment strategies, some risks are as follows:

- **General Market Risks**. Markets can, as a whole, go up or down on various news releases or for no explicable reason. This uncertainty means that, at times, the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities may not help minimize this risk since all securities may be affected by market fluctuations. Market fluctuations will ultimately affect a client's portfolio holdings.
- **Financial Risks**. All companies have exposure to financial risks. Excessive borrowing to finance business operations decreases profitability because companies must meet their obligations in good and bad economic times. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy or declining market value of a company's securities. All businesses are susceptible to financial risks at some point in a business cycle. When we invest in companies with excessive debt, the financial risk of that company could negatively affect a client's portfolio holdings.
- **Investment Company Security Risks**. Investments in investment company securities ("mutual funds") and exchange-traded funds ("ETFs") have risks. This risk disclosure focuses on mutual funds. See specific details regarding ETF risks below. The risks associated with investing in mutual funds involve substantially the same risks as investing directly in the underlying securities (i.e., general market risks, interest rate risks, financial risks, time-horizon risks, liquidity risks, etc.). There is also a risk that a mutual fund may not achieve its investment objective or execute its investment strategy effectively, which may adversely affect the performance of a client's portfolio. Additionally, clients pay a pro-rata portion of the internal fees and expenses associated with mutual funds, which are likely to impact the value of a client's portfolio holdings.
- **Equity Securities Risks**. Equity securities such as common stocks are subject to changes in value attributable to the market perception of a particular issuer or general stock market fluctuations that affect all issuers. Investments in equity securities may be more volatile than other types of investments.
- **ETF Risks.** There are risks associated with investing in exchange-traded funds (ETFs) that may be unrecognized. ETFs are registered investment companies whose shares represent an interest in a portfolio of securities designed to track an underlying benchmark or index. ETFs are offered for all asset classes, industries, sectors, markets, etc. Although ETFs seek to track an underlying benchmark or index, the ETF may or may not hold all securities in the underlying benchmark or index. ETFs are also subject to price variations. ETFs trade throughout the day and market prices are generally at or near the most recent net asset value (NAV). However, certain market inefficiencies may cause the shares to trade at a premium or discount to the stated NAV. For example, a high volume of market sells may cause ETFs to trade below the value of the underlying NAV.

  Moreover, as with any security, there is no guarantee that an active secondary market for such ETF shares will continue to exist. Also, the redemption of ETFs can be limited. Only an authorized participant (generally broker-dealers that act as liquidity providers) may create or make redemption of transactions in ETFs. Furthermore, ETFs typically have a limited number of broker-dealers that may act as authorized participants. To the extent that authorized participants exit the business or are unable to proceed with creation or redemption orders, and no other authorized participant can step forward, the liquidity of an ETF is likely to be impacted and could face trading halts or delisting.

- **Asset Allocation Risks**. The asset classes represented in a client's portfolio holdings can perform differently from each other at any given time, as well as over the long term. A client's portfolio holdings will be affected by the allocation among equity securities (e.g., mutual funds and exchange-traded funds, etc.) and cash equivalents. If any asset class that comprises a client's holdings underperforms, the performance of other asset classes may suffer.
- **Concentration Risks**. Our investment strategies utilize high concentrations of equities. Investing in growth assets, specifically, equities is inherently risky, but to an even greater degree than fixed-income investments. Equities and other high volatility asset classes are unforgiving if time horizon, risk tolerance, and financial needs are not considered. Client accounts invested in high concentrations of certain securities generally lack diversification and can thereby lead to higher degrees of risk.
- **Time Horizon Risks**. A client may require the liquidation of portfolio holdings earlier than the anticipated stated time horizon. If liquidations occur during a period that portfolio values are low, the client will not realize as much value as he/she would have, had the portfolio holdings had the opportunity to gain value (or regain its value) as investments frequently do.
- **Regulatory and Governmental Risk.** Changes in laws and regulations can change the value of securities. Certain industries are more susceptible to government regulation. If portfolio holdings are invested heavily in a particular sector or industry, correlating zoning changes, tax structure, or specific industry regulations could impact returns or holdings.
- **Reliance on Advisor.** The performance of clients' portfolio holdings depends on the skill and expertise of our professional staff to make appropriate investment decisions. The success of client portfolios depends on our firm's ability to develop and implement investment strategies and apply investment techniques and risk analyses to achieve a client's investment objectives. Our firm's subjective decisions may cause portfolios to incur losses or to miss profit opportunities that may otherwise have capitalized. For example, our portfolios may include customized investment features that may impact the implementation of specific investment strategies.

Notwithstanding the method of analysis or investment strategy employed by our firm, the assets within a portfolio are subject to the risk of devaluation or loss. We want clients to be aware that many different events can affect the value of assets or portfolios, including but not limited to changes in the financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters. While this information provides a synopsis of the events that may affect investments, this is not an exhaustive listing.

We want you to understand that there are inherent risks associated with investing, and depending on the risk occurrences, you may ALL OR A SUBSTANTIAL PORTION OF YOUR PRINCIPAL INVESTMENT.

Recommendation of Specific Types of Securities

Generally, our advice encompasses making recommendations relative to no-load mutual funds and select exchange-traded funds. We may, upon client request, incorporate other securities into the portfolio construction process.

DISCIPLINARY INFORMATION (Item 9)

Neither our firm nor its management has been involved in any industry-related legal or disciplinary events.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS (Item 10)

Financial Industry Activities

We are not a registered broker-dealer and do not have an application pending to register as a broker-dealer. Additionally, neither our management personnel nor investment advisor representatives are registered representatives of a broker-dealer or have applications pending to register.

Financial Industry Affiliations

We are not registered do not have an application pending to register as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor. We do not have a firm principal or investment advisor representative registered as an associated person of any entity noted.

Other Affiliations

Mr. Vince Clanton and Mr. Scott Clanton are licensed insurance agents who offer and sell insurance products to advisory clients for asset and income protection and risk management needs. Insurance offerings include life, health, disability, and long-term care insurance. Many of the insurance products are sold through separate and distinct vendors. Our investment advisor representatives may devote up to ten percent (10%) of their workweek to selling insurance products.

When acting in the insurance agent capacity, Mr. Vince Clanton and Mr. Scott Clanton receive separate yet customary compensation for insurance product sales. In instances where Mr. Vince Clanton or Mr. Scott Clanton receive advisory fees in addition to insurance commissions, his compensation will be higher than if purchased separately or absent of the advisory fee component.

Advisory fees are not offset by insurance commissions earned; therefore, insurance products may be available through more cost-effective channels. Clients always have the right to decide whether to purchase insurance products recommended by our investment advisor representative(s). Clients can purchase insurance products through any insurance agent.

Acting in dual roles (insurance agent and investment advisor representative) and receiving compensation in dual capacities creates conflicts of interest. Accordingly, this is our notification of the conflicts of interest that result from the sale of insurance products. We will disclose applicable conflicts in writing prior to providing other services that create conflicts of interest.

We do not have an affiliated entity. Further, we do not have any material arrangement or relationship with a related person that is a broker-dealer, municipal securities dealer, government securities dealer or broker, 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), other investment advisor or financial planner, futures commission merchant, commodity pool operator, commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, pension consultant, real estate broker or dealer, sponsor or syndicate of limited partnerships not already disclosed herein.

Other Investment Advisers

We do not recommend other investment advisors to our clients.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING (Item 11)

Code of Ethics

We require that all employees of Chancellor Wealth Management act ethically and professionally. Our management persons, investment advisor representatives, and other employees (collectively, “personnel”) subscribe to a strict code of ethics. Our Code of Ethics is constructed to comply with the investment advisory laws and regulations that require firms to act as fiduciaries in transactions with their clients. Our inherent fiduciary duty requires that we act solely in our clients’ best interests and adhere to standards of utmost integrity in our communications and transactions. These standards ensure that clients’ interests are given precedence.

Accordingly, we have implemented comprehensive policies, guidelines, and procedures that promote ethical conduct and practices by all of our personnel. The foregoing has been compiled and is collectively referred to as our Code of Ethics. We adopted our Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or perceived conflicts of interest) and establish reporting requirements and enforcement procedures related to personal securities transactions by our personnel.

Our Code of Ethics, which specifically deals with our fiduciary duty, professional standards, insider trading, personal trading, and gifts and entertainment, establishes our ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust.

We will provide a copy of our complete Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

We do not recommend that clients buy or sell securities that a related person may have a material financial or ownership interest.

Personal Trading

Proprietary Trading

We will, at times, buy or sell securities for the personal accounts of our employees that we also recommended to clients. We will always document any transactions that could be construed as a conflict of interest. Conflicts of interest relative to trades for employees ("personal accounts") may present in many different contexts. Some conflicts of interest related to personal accounts include trading ahead to obtain a better transaction execution price than clients, recommendations or trades based on financial interest, trading on information that is not available to the public, or structuring transactions in a manner so that the results are profitable for employees' accounts. To mitigate or remedy any conflicts of interest or perceived conflicts, we monitor internal trading reports for adherence to our Code of Ethics.

Simultaneous Trading

From time to time, we are likely to buy or sell investments for the personal accounts of our employees at or around the same time as clients. As summarized above, our Code of Ethics requires us to (1) act in accordance with all applicable federal and state regulations, (2) act in the best interest of clients, (3) pre-clear transactions in private placements, or initial public offerings, and (4) review of personal securities transactions by employees to confirm adherence. Our chief compliance officer performs this review. In any instance where similar securities are purchased or sold, we will uphold our fiduciary duty by ensuring that transactions are beneficial to our clients' interests.

BROKERAGE PRACTICES (Item 12)

Selection and Recommendation

We make a recommendation of account custodians after evaluating several factors. These factors include but are not limited to fees and expenses, the capability to execute, clear, and settle trades, reputation, breadth of investment products made available, access to securities markets, and expertise in handling brokerage support processes.

We maintain a custodial services agreement with TD Ameritrade Institutional, a division of TD Ameritrade, Inc. (hereinafter, "TDAI"). TDAI is a registered broker-dealer (a member of FINRA and SIPC). Our firm is independently owned and operated and not an affiliate of TDAI. We are participants of the TDAI platform for independent services platform for independent investment advisors. TDAI provides brokerage, operational support, and other custodial services to our firm. As a result of our established service agreement, TDAI receives preferential status when recommending account custodians for our advisory transactions.

We receive economic benefits through our participation in the TDAI platform, which may include discounts on compliance, marketing, technology, and practice management products or services provided to our firm by third-party vendors. The benefits we receive do not depend on the number of brokerage transactions directed to TD Ameritrade.

Notwithstanding our agreement with TDAI, we reserve the right to use other or additional firms for custodial or brokerage services.

1. Soft Dollar Benefits

As a participant of an institutional services platform, we receive ancillary soft dollar benefits to support all our advisory accounts and certain operational processes. The soft dollar benefits include but are not limited to duplicate client confirmations and bundled duplicate statements, access to a trading desk serving platform participants exclusively, access to block trading, which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts, mechanisms to facilitate the deduction of advisory fees directly from client accounts, access to an electronic communication network for order entry and account information; receipt of compliance publications, and access to other products and services that are generally available to only institutional platform participants.

As of the date of this Brochure, we have not entered into any agreement with an account custodian, broker-dealer, or any other third party to receive soft dollar credits. Soft dollar credits are earned from clients' securities transactions as a result of an increase in transaction costs or commissions and subsequently used to pay for the research or other products or services provided by an account custodian. Therefore, although we receive ancillary soft dollar benefits, our firm does not earn soft dollar credits.

If TDAI discounts or waives fees related to client transactions or custodial services or pays for all or a part of any third party's fees, our receipt of these benefits from TDAI creates conflicts of interest. Such arrangements incentives us to recommend TDAI rather than another account custodian.

Nonetheless, our receipt of ancillary platform services and discount or waived service fees from TDAI does not diminish our duty to act in our clients' best interests, which includes, among other things, seeking best execution of trades for client accounts (i.e., best fees, services, and execution for client accounts).

2. Brokerage for Client Referrals

We do not receive client referrals from account custodians (broker-dealers) or other third parties in exchange for using any particular broker-dealer.

3. Directed Brokerage

(a) We recommend that clients utilize TDAI. Our service agreements are designed to maximize trading efficiencies and cost-effectiveness on behalf of our clients. By recommending that clients use TDAI, we seek to achieve the most favorable results relative to trading costs, allocation of funds, and rebalancing of client investments.

(b) If a client prefers a particular account custodian, we will notify the custodian of our advisor-client relationship and proceed accordingly. However, under such arrangements, we are typically limited in negotiating transaction costs or obtaining best execution. Also, we are unable to aggregate trades and disparities in transaction costs among clients who use our recommended account custodian versus clients who prefer to use their own. More importantly, there are likely to be higher costs associated with brokerage transactions under a directed arrangement.

Order Aggregation

In the ordinary course of business, we may (but are not obligated to) block or aggregate orders for all advisory accounts, including our personal accounts, to execute transactions in a more timely, equitable, cost-effective, and efficient manner. When we block or aggregate trades, purchase and sale orders are averaged as to price and allocated among accounts proportionally. This practice is reasonably likely to result in an administrative convenience for our firm and an overall economic benefit to clients. Clients benefit relatively with an averaged purchase or sell execution prices, lower transaction expenses, beneficial timing of transactions, or a combination of these and other factors.

If we decide that order aggregation is in the best interest of clients, before aggregating trades, we will prepare a written allocation statement specifying each advisory account that will participate in the aggregated order and the anticipated allocation among the accounts if the order is filled in its entirety. If the order is partially filled, allocations will be made according to our judgment of the best interest of each client, and we will document the rationale for such allocation decisions. For example, if an order is filled partially, client orders will be allocated before any personal account allocations. Each account participating in a block trade will pay or receive the average price for all shares included in the transactions for such securities on that day, to include applicable transaction costs.

Any change to an allocation must treat each client fairly and equitably and must be explained in writing and approved by our chief compliance officer promptly (generally no later than one hour) after the opening of the markets on the trading day following the day the order was executed.

Our firm does not receive any additional compensation or remuneration as a result of order aggregation. The chief compliance officer will review transactions periodically to detect and prevent inefficiencies that result from non-compliance with our order aggregation policies and procedures.

REVIEW OF ACCOUNTS (Item 13)

Periodic Reviews

Our criteria for reviewing clients' accounts are as follows:

1. Review of Financial Plans

We prepare financial plans based on the financial data that clients provide to our firm. Clients may elect to have an annual review of the progress of the written financial plan. The annual review is subject to our hourly financial planning rate. The average fee ranges between $200 and $400. Nonetheless, clients who have entered into an agreement for investment management services are not assessed advisory fees for annual reviews, consultations, or other financial planning updates that may occur during the year.

2. Review of Investment Management Portfolios

We review portfolio activity no less than annually. Our reviews determine whether a client's portfolio strategies continue to align with the stated investment goals and objectives. Investment portfolio reviews are completed by Mr. Vince Clanton and Mr. Scott Clanton. If a client's portfolio drifts from the model portfolio target allocation, based on our authority and the need for rebalancing, we will buy or sell investments that align with the client's investment goals, objectives, and strategies.

3. Retirement Plan Advisory Reviews

Reviews for retirement plan consultation services are limited. Plan participants will not receive scheduled reviews or on-going reports. These services are provided on a global basis and do not include personalized investment advice.

Intermittent Review Factors

Periodic reviews may be triggered by substantial market fluctuation, economic or political events, or by changes in a client's financial status (such as retirement, termination of employment, relocation, or inheritance). Clients should contact us to initiate an episodic review upon the occurrence of any of the foregoing events.

Client Reports

We do not issue separate written reports to clients. Clients receive transaction confirmations from the account custodian shortly after trading activity (buys or sells). Additionally, the account custodian sends monthly statements for each month in which there is trading activity. If there is no trading activity during any month, clients receive account statements quarterly.

CLIENT REFERRALS AND OTHER COMPENSATION (Item 14)

Economic Benefits for Advisory Services

We do not receive referral compensation or have any arrangement to receive economic benefits from any third party for providing advisory services to our clients.

Compensation for Client Referrals

Our firm does not compensate any person for client referrals.

CUSTODY (Item 15)

Custodian of Assets

We do not hold physical custody of client funds or securities. We require that qualified custodians hold client assets. For more information regarding the account custodian (broker-dealer) that services our accounts, please review the Brokerage Practices section (Item 12).

Our firm has indirect custody of client funds and securities because of our authorization and ability to deduct advisory fees directly from clients' accounts; nonetheless, we have implemented the safeguard requirements of state regulations by requiring safekeeping of clients' funds and securities by a qualified custodian.

We also have indirect custody of client funds and securities due to utilizing asset movement authorizations to process account disbursements at a client's request. Nonetheless, in all instances of indirect custody, we have implemented the account custodian's requisite internal control procedures for safeguarding client assets.

Account Statements

The account custodian sends monthly or quarterly electronic notifications to clients regarding the availability of account statements. Clients are advised to review account statements carefully, comparing asset values, activity, holdings, allocations, performance, and advisory fees on current statements to that in previously received statements, confirmations, and advisory fee invoices.

INVESTMENT DISCRETION (Item 16)

Discretionary Authority

It is customary for our firm to exercise discretionary authority to manage and direct the investments of clients' accounts. This authority is granted upon the execution of our investment management agreement. Discretionary authority is to make and implement investment decisions without prior consultation with clients. Investment decisions include determining the types and dollar amounts or percentages of securities to be bought or sold for the account(s). All decisions are made in accordance with a client's stated investment objectives. At any time during our engagement, clients may advise us in writing of any limitations on our authority. Clients may impose limits on investing in securities in specific industries or countries, etc., and dollar amounts or percentages of investments in the foregoing.

There are some instances where we exercise non-discretionary authority in managing and directing clients' investments. When we make investment decisions using non-discretionary authority, we seek the client's consultation and approval (oral or written) prior to implementing investment strategies. Utilizing non-discretionary authority is not our typical practice, and this authority is generally only used for clients who specifically request non-discretionary authority.

VOTING CLIENT SECURITIES (Item 17)

We do not cast proxy votes on behalf of investment management clients. Clients are responsible for casting proxy votes solicited by issuers of securities. Clients are also responsible for making elections relative to mergers, acquisitions, tender offers, bankruptcy proceedings, and other types of events about the securities in a client's account(s).

Clients will receive proxy and other solicitation information by mail from the account custodian or securities issuer's transfer agent. We instruct clients to follow the instructions for proxy voting or making an election relative to a merger or any other legal matter included in the transfer agent's correspondence.

FINANCIAL INFORMATION (Item 18)

Balance Sheet Requirement

Our firm does not require or solicit prepayment of more than $500 in advisory fees, six (6) months or more in advance. Moreover, we do not meet any custody requirements that would require submitting a balance sheet with this filing.

Discretionary Authority, Custody of Client Funds or Securities and Financial Condition

We customarily exercise discretionary authority to supervise and direct the investments of clients' accounts; nonetheless, we may exercise non-discretionary authority at a client's request. We have indirect custody of a client's funds or securities due to our authorization and ability to withdraw advisory fees directly from clients' accounts. More importantly, we do not have any financial condition that will impair our ability to meet our contractual commitments to clients.

Bankruptcy Petition Filings

Our firm has not been the subject of a bankruptcy petition at any time during the past ten (10) years.

REQUIREMENTS FOR STATE REGISTERED ADVISERS (Item 19)

Firm Management

Our firm has two (2) corporate officers, H. Vincent Clanton, President, and Scott T. Clanton, Vice President. Specific information regarding the educational and business backgrounds of Mr. H. Vincent Clanton and Mr. Scott T. Clanton is outlined in the attached respective Brochure supplements.

Other Business Activities

The other business activities of our firm and management personnel are listed in Item 10, Other Affiliations. Please review this section for details.

Performance-Based Fees

Our firm does not assess performance-based fees.

Disciplinary Disclosure Reporting

1. Arbitration Claims. <u>NONE</u>
2. Civil Litigation, Self Regulatory Organization Proceedings, or Administrative Actions. <u>NONE</u>

Relationships or Arrangements with Securities Issuers

Neither our firm nor management personnel has additional relationships or arrangements with any issuers of securities.

ADDITIONAL DISCLOSURES

CFP Board Disclosures

Our firm employs CERTIFIED FINANCIAL PLANNER™ professionals, H. Vincent Clanton, MBA, CFP®, CLU®, and Scott T. Clanton, CFP® (the Brochure supplements for Mr. Vincent Clanton and Mr. Scott Clanton outline specific details regarding conferment of the CFP® professional designation). Accordingly, we also adhere to the CFP Board's Standards of Professional Conduct.

We encourage clients to review all of the information outlined in this Brochure that serves as our disclosure document. We welcome any questions that clients may have regarding our advisory services (see Item 4, Advisory Services), compensation (see Item 5, Fees and Compensation), other services and affiliations (see Item 10, Other Financial Industry Activities and Affiliations), conflicts of interest (see Item 11, Code of Ethics, Item 12, Brokerage Practices, and Additional Disclosures).

Should any material changes occur to the information outlined in this Brochure, updates will be provided to clients in a reasonable time frame, generally within thirty (30) days as required by advisory regulations. We acknowledge our responsibility to adhere to the standards established by the CFP Board's Standards of Professional Conduct, including the duty of care of a fiduciary, as defined by the CFP Board.

Retirement Plan Rollovers

Prospective or existing clients leaving an employer typically have four (4) options regarding assets in an existing retirement plan:

1. roll over the assets to the new employer's plan, if available, and rollovers are permitted;
2. leave the assets in the former employer's plan if allowed;
3. roll over the assets to an Individual Retirement Account ("IRA"); or
4. cash out the account value (adverse tax consequences may be applicable).

If we recommend that a client roll over retirement plan assets into an account to be managed by our firm, such a recommendation creates a conflict of interest because we will earn advisory fees as a result of the rollover. As a fiduciary, we are required to ensure that such a recommendation is in a client's best interest. Clients with questions regarding this conflict of interest should request additional details or clarification from their investment advisor representative.

This brochure supplement provides information about Investment Advisor Representative Herschel Vincent Clanton, CRD No. 2772945, which supplements the firm brochure of Chancellor Wealth Management, Inc. (CRD/IARD No. 112918). You should have received a copy of that brochure. Please contact Herschel Vincent Clanton if you did not receive the Chancellor Wealth Management Brochure or if you have any questions about the contents of this supplement.

Additional information about Investment Advisor Representative Herschel Vincent Clanton, CRD No. 2772945, can be found on the Investment Adviser Public Disclosure website www.adviserinfo.sec.gov.

This website can be searched by using the investment adviser representative's CRD number (shown above).

BROCHURE SUPPLEMENT
(Form ADV Part 2B)

for

Herschel Vincent Clanton, MBA, CFP®,CLU®

Chancellor Wealth Management, Inc.
100 Galleria Parkway SE, Suite 995
Atlanta, Georgia 30339
Phone: (770) 661-0283
Fax: 1-888-479-7935
Website: chancellorwealth.com
Email: vince@chancellorwealth.com

March 30, 2021

BROCHURE SUPPLEMENT for Herschel Vincent Clanton, CRD No. 2772945

EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE (Item 2)

Chancellor Wealth Management requirements for Investment Advisor Representative Employment

We require that employees who provide advice on behalf of the firm have at least a 4-year college degree, preferably an advanced degree, and no less than two (2) years of relevant work experience in the financial services industry. Additionally, employees must have passed the requisite securities and state advisory exams such as Series 7, Series 66, Series 63, and Series 65. Moreover, employees should also have or be willing to obtain life and health insurance licenses.

Investment Advisor Representative's Information:
Herschel Vincent Clanton, MBA, CFP®, CLU®
Year of Birth: 1948

Educational Background

Rice University, Houston, Texas, 1967
Bachelor of Science in Aerospace Engineering, Georgia Institute of Technology, Atlanta, GA, 1970
Master of Business Administration (Finance), Georgia State University, Atlanta, GA, 1977

Professional Designations

Certified Financial Planner (CFP) Designation, College of Financial Planning, 2002
Certified Financial Planner, **CFP®** and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The **CFP® certification** is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete on-going education and ethics requirements in order to maintain the right to continue to use the CFP® marks.

Chartered Life Underwriter (CLU®) Designation, American College, 2002
The CLU® is a professional designation conferred by the American College that measures the competency of insurance experts. The CLU® designation is awarded upon completion of eight (8) self-study courses covering advanced insurance related disciplines, including fundamentals of insurance planning, individual life insurance, life insurance law, estate planning, and planning for business owners and professionals and at least three (3) years of full time industry experience.

Business Experience

President, Chief Compliance Officer & Investment Advisor Representative Chancellor Wealth Management, Inc. (f/k/a) The Chancellor Group, Inc. Atlanta, Georgia	2002 to Present
Registered Representative The O.N. Equity Sales Company Atlanta, Georgia Branch	2000 - 2019
Investment Advisor Representative O.N. Investment Management Company Atlanta, Georgia Branch	2010 - 2019
President, CEO, CFO Health Partners' Services, Inc. Atlanta, Georgia	1997 - 2000
President/Owner RMCBS (A Food Brokerage Company) Atlanta, Georgia	1972 - 1995

DISCIPLINARY INFORMATION (Item 3)

Criminal or Civil Actions

None. Also see Item 19 of the attached Brochure.

Administrative Actions or Proceedings

None. See Item 19 of our attached Brochure.

Self-Regulatory Organization (SRO) Proceedings

None. See Item 19 of our attached Brochure.

Professional Standards Violations

None.

OTHER BUSINESS ACTIVITIES (Item 4)

Investment Related

Vince Clanton is not engaged in any other investment-related activity.

Non-Investment Related

Mr. Clanton is a licensed insurance agent who transacts insurance product sales through various insurance vendors. He will earn separate yet customary compensation for insurance product sales. Mr. Clanton spends up to ten percent (10%) of his workweek selling insurance products.

ADDITIONAL COMPENSATION (Item 5)

Mr. Clanton does not receive economic benefits from any third party.

SUPERVISION (Item 6)

Vince Clanton is the chief compliance officer; in such a capacity, he is responsible for supervising the activities of the firm's investment advisor representatives and the administration of operations. We administer supervision through the application of our written policies and procedures.

For questions regarding our supervisory practices, contact Vince Clanton by telephone (770) 661-0283 or email: vince@chancellorwealth.com.

REQUIREMENTS FOR OF STATE REGISTERED ADVISERS (Item 7)

Additional IAR Disciplinary Events

1. **Awards granted or findings of liability in consequential Arbitration Claims**
   None. See Item 19 of our attached Brochure.
2. **Awards granted or findings of liability in consequential Civil, SRO, or Administrative proceedings.**
   None. See Item 19 of our attached Brochure.

IAR Bankruptcy Petition Filings

Mr. Clanton has not been the subject of a bankruptcy petition at any time during the past ten (10) years.

This brochure supplement provides information about Investment Advisor Representative Scott Taylor Clanton, CRD No. 6376909, that supplements the firm brochure of Chancellor Wealth Management, Inc. (CRD/IARD No. 112918). You should have received a copy of that brochure. Please contact Scott Taylor Clanton (contact information below) if you did not receive the Chancellor Wealth Management Brochure or if you have any questions about the contents of this supplement.

Additional information about Investment Advisor Representative Scott Taylor Clanton, CRD No. 6376909, can be found on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. This website can be searched by using the investment adviser representative's CRD number (shown above).

BROCHURE SUPPLEMENT

(Form ADV Part 2B)

for

Scott T. Clanton, CFP®

CHANCELLOR
WEALTH MANAGEMENT

Chancellor Wealth Management, Inc.
100 Galleria Parkway SE, Suite 995
Atlanta, Georgia 30339
Phone: (770) 661-0283
Fax: 1-888-479-7935
Website: chancellorwealth.com
Email: scott@chancellorwealth.com

Supervisory Contact

Mr. H. Vincent Clanton, MBA, CFP®, CLU®
President & Chief Compliance Officer
Phone: (770) 661-0283
Email: vince@chancellorwealth.com

March 30, 2021

BROCHURE SUPPLEMENT for Scott Taylor Clanton, CRD No.6376909

EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE (Item 2)

Chancellor Wealth Management requirements for Investment Advisor Representative Employment

We require that employees who provide advice on behalf of the firm have at least a 4-year college degree, preferably an advanced degree, and no less than two (2) years of relevant work experience in the financial services industry. Additionally, employees must have passed the requisite securities and state advisory exams such as Series 7, Series 66, Series 63, and Series 65. Moreover, employees should also have or be willing to obtain life and health insurance licenses.

Investment Advisor Representative's Information:

Scott Taylor Clanton, CFP®

Year of Birth: 1976

Educational Background

B.A. Business Administration, Furman University, Greenville, South Carolina, 1998
Master of Div., Southeastern Baptist Theological Seminary, Wake Forest, North Carolina, 2003
South Carolina Bankers School, Columbia, South Carolina,2007
ABA Stonier Graduate School of Banking, Philadelphia, Pennsylvania, 2012

Professional Designation

Certified Financial Planner (CFP) Designation, College of Financial Planning, 2017

Certified Financial Planner, **CFP®** and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The **CFP® certification** is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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Individuals who become certified must complete on-going education and ethics requirements in order to maintain the right to continue to use the CFP® marks.

Business Experience

Vice President 2014 to Present
& Investment Advisor Representative
Chancellor Wealth Management, Inc.
(f/k/a) The Chancellor Group, Inc.
Atlanta, Georgia

Registered Representative 2014 - 2019
The O.N. Equity Sales Company
Atlanta, Georgia Branch

Vice President 2008 - 2014
& Commercial Relationship Manager
Branch Bank & Trust (BB&T)
Myrtle Beach, South Carolina

Vice President 2003 - 2008
NBSC/Synovus Bank, Myrtle Beach SC
Myrtle Beach, South Carolina

Vice President 1998 - 2001
NBSC/Synovus Bank
Myrtle Beach, South Carolina

DISCIPLINARY INFORMATION (Item 3)

Criminal or Civil Actions

None. Also see Item 19 of our Brochure.

Administrative Actions or Proceedings

None. See Item 19 of our attached Brochure.

Self-Regulatory Organization (SRO) Proceedings

None. See Item 19 of our attached Brochure.

Professional Standards Violations

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OTHER BUSINESS ACTIVITIES (Item 4)

Investment Related

Scott T. Clanton is not engaged in any other investment-related activity.

Non-Investment Related

Mr. Clanton is a licensed insurance agent who transacts insurance product sales through various insurance vendors. Mr. Clanton will earn separate yet customary compensation for insurance product sales. Mr. Clanton may spend up to ten percent (10%) of his workweek selling insurance products.

ADDITIONAL COMPENSATION (Item 5)

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