

BROCHURE
(Form ADV Part 2A)



CHANCELLOR
WEALTH MANAGEMENT

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March 16, 2020

This 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 content 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, only that we have 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 the investment advisor representatives of our firm begin after page 15, and this document is not complete without a brochure supplement.

MATERIAL CHANGES (Item 2)

Chancellor Wealth Management Material Changes since last update

This version of our Brochure dated March 16, 2020 is an annual amendment. The following are the material changes to our business practices since the last filing in September of 2019:

Advisory Services (Item 4)

Assets under Management

We have updated our assets under management figure as required by regulations. We currently* manage a total of \$71,033,831 in client assets; \$54,534,634 is managed on a discretionary basis and \$16,499,197 on a non-discretionary basis. *Our asset under management calculations are as of December 31, 2019.

General (non-material) Revisions

We have revised some information or included additional language to ensure that our disclosures are clear and succinct.

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 our Brochure, please contact us by telephone at (770) 661-0283 or by email to 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 began advisory operations in 2002 and have been providing advice to our clients since that time. 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 financial planning and personalized 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 the management of 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 as well as 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 contained 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 recommendations, there is no obligation to implement the recommendations through our firm. Clients may implement recommendations with a professional adviser of personal choosing.

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 creates a conflict 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 both 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 that are tailored to meet a client’s financial goals and investment objectives. If retained for investment management services, we meet with our clients to gather information regarding specific investment goals, objectives, time horizon, risk tolerance, and other relevant suitability information. We typically recommend portfolios consisting of no-load mutual funds and select exchange-traded funds.

We will use the information gathered to develop a strategy that enables our firm to provide continuous and focused investment advice. After constructing and implementing an investment plan, we monitor the performance of our client’s portfolio(s) on an ongoing basis.

3. Retirement Plan Advisory Services

We provide ERISA non-fiduciary plan consulting services to plan participants and beneficiaries. Our services generally consist of educational services wherein we assist retirement plan participants (and beneficiaries) 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 as well as fee and expense evaluations for plan participants (and beneficiaries).

Tailored Services

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

Wrap Fee Programs

We are not a participant in any wrap fee program.

Assets under Management

We currently* manage a total of \$71,033,831 in client assets; \$54,534,634 is managed on a discretionary basis and \$16,499,197 on a non-discretionary basis. *Our asset under management calculations are as of December 31, 2019.

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 executing of our financial planning agreement.

(b) Fixed Fees

If, after our presentation of the written financial plan, 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 - \$250,000	1.75%
\$250,001 - \$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 for implementation of the financial plan (i.e., utilize our investment management services) will only incur a fixed fee of \$500 for the preparation of 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

Fees for investment management services are billed quarterly in advance, meaning client invoices for advisory fees are transmitted to the account custodian, electronically or otherwise, at the beginning of the calendar quarter. Advisory fees for services that incurred for any period of less than the full billing cycle will be prorated based on the number of days that remain in the current quarter as of the day the assets are transferred or deposited into the account. Further, no fee adjustments will be made for additional deposits and/or partial withdrawals during any quarter. Unless directed otherwise by a client, for billing purposes, we use the aggregate value of all accounts for each client (i.e., household).

The advisory fee assessment is based on the value of a clients' account(s) as of the last business day of the previous quarter and also includes the value of the cash and cash equivalent positions in the account(s). When calculating the advisory fees, all open positions shall be valued at the market value, which means the settlement price, as determined by the exchange on which the transaction is effected, or the most recent appropriate quotation as supplied by the account custodian. If there are no trades on the date of the calculation due to operation of the daily price fluctuation limits or due to a closing of the exchange, the open position will be valued at fair value as of the close of the then most recent trading day.

By agreement and a client's written authorization incorporated in our investment management agreement, our advisory fees are generally deducted directly from a client's specified account(s). 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 and remitted to us.

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. Please note that 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 expenses of the investment company that issues the security but a cost that is 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 and distinct 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 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 days, either party may terminate our advisory agreements at any time by providing thirty (30) days advance written notice to the other party. Upon receipt of the termination request, we will assess fees pro-rata up to the date of termination, and any unearned portion of prepaid fees will be refunded within fourteen (14) days. Any unpaid fees due to our firm will be collected prior to the disbursement of funds, if applicable. In the event we are unable to deduct final fees from the account(s), in the case of an account transfer, we will transmit an invoice to the client, which is due upon receipt.

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 and we do not 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. Please be advised, however 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 Ibbotson & Associates, a division of Morningstar, as a resource to provide our risk tolerance questionnaire and the suggested model portfolios that are generated based on a client’s response to our inquiries. The questionnaire is designed for discerning a client’s maximum tolerance for risk. Ibbotson also analyzes mutual funds using a return-based approach to determine the representative composition of funds by individual asset class. Ibbotson 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 in 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 that have lower fees, we evaluate mutual funds for risk and return over varying time periods against comparable funds through the use of Investment View software provided by Thomson Reuters.

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/or 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 to 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 the company must meet the terms of its obligations in good and bad economic times. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/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 that have excessive debt, the financial risk of that company could negatively affect a client's portfolio holdings.
- **Equity Securities Risks.** Equity securities such as mutual funds and exchange-traded funds are subject to changes in value that may be attributable to 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 that are designed to track an underlying benchmark or index. Although ETFs seek to track an underlying benchmark or index, the ETF may or may not hold all of the 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 sales may cause ETFs to trade below the value of the underlying NAV.

Moreover, as with any security, there is also 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 engage in creation or redemption transactions of an ETF. 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 that are 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 at a time 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 changes in zoning, tax structure, or specific industry regulations could have an impact on returns or holdings.
- **Reliance on Advisor.** The performance of clients' portfolio holdings depends on the skill and expertise of our firm's staff to make appropriate investment decisions. The success of client portfolios depends upon our firm's ability to develop and implement investment strategies and to apply investment techniques and risk analyses that achieve a client's investment objectives. Subjective decisions made by us may cause portfolios to incur losses or to miss profit opportunities on which it 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 that 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 as or have applications pending to register as registered representatives of a broker-dealer.

Financial Industry Affiliations

We are not registered as, and do not have applications pending to register as, a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor, nor is any firm principal or investment advisor representative registered as an associated person thereof.

Other Affiliations

Mr. Vince Clanton and Mr. Scott Clanton are also 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.

In Mr. Vince Clanton's and Mr. Scott Clanton's capacity as insurance agents, they will 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 are not obligated to purchase any insurance products recommended by our firm.

Insurance products may be available through more cost-effective channels, and clients are not obligated to purchase insurance products recommended by the investment advisor representatives of our firm.

Acting in dual roles (insurance agent and investment advisor representative) and receiving compensation as such, creates conflicts of interest. This disclosure is our notification of the conflict of interest mentioned above; additional conflicts will be disclosed in writing prior to providing other services.

We do not have an affiliate 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 extensive 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), as well as to establish reporting requirements and enforcement procedures relating to personal 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 related persons may have a material financial 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 a 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

We are likely, from time to time, 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 the interest of our clients.

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 and member of FINRA and SIPC. We are participants of the TDAI institutional services platform for independent investment advisors.

Our firm is independently owned and operated and not an affiliate of TDAI. TDAI provides brokerage, operational support, and other custodial services to our firm. As a result of our established service agreement, cost implications, operational support, and custodial services, TDAI receives preferential status when recommending account custodians for our advisory transactions.

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

1. Soft Dollar Benefits

We have not entered into any arrangement to receive research or other products or services (i.e., soft dollar benefits) other than execution from an account custodian, broker-dealer or any other third party.

Nonetheless, as a participant of an institutional services platform, we do receive ancillary benefits to support operational processes such as 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 only to institutional platform participants.

The foregoing benefits are received solely through the aforementioned institutional advisory platforms and do not necessarily depend upon the proportion of transactions directed to any account custodian.

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) We also permit clients to direct brokerage. If a client prefers a certain account custodian or broker-dealer, we will notify the custodian of our advisor-client relationship and proceed accordingly. Clients are advised that there may be greater costs associated with brokerage transactions pursuant to a directed arrangement.

Order Aggregation

In the normal 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 for each client, and such allocation decisions will be documented. 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 ongoing investment management services are not assessed fees for annual reviews, consultations, or other financial planning updates that may take place during the year.

2. Review of Investment Management Portfolios

We review portfolio activity no less than annually. Our reviews consist of determining whether a client's portfolio strategies continue to align with the stated investment goals and objectives. 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 (or beneficiaries) 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 issue separate performance reports to clients regarding accounts quarterly. In addition to performance data, these reports include statements of gains and losses and a financial market summary. Please review our performance statements carefully, comparing the asset values in our reports to the asset values indicated in the account statements issued by the account custodian.

In addition to the reports we send, clients will receive transaction confirmations from the account custodian shortly after trading activity (purchases or sells). The account custodian also sends monthly statements for each month in which there is trading activity. If there is no trading activity during any month, clients will receive account statements at least quarterly detailing account activity.

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. To ensure safekeeping of assets subject to movement authorizations, we have implemented the requisite account custodian procedures for safeguarding client assets.

Account Statements

The account custodian will send 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), and such decisions are made in accordance with a client's stated investment objectives. Clients may, at any time during our engagement, advise us in writing of any limitations on our authority. Clients may impose limitations 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. Under non-discretionary authority, we seek the client's consultation and approval (oral or written) prior to implementing investment strategies or decisions. This is not our general practice, and this authority is generally only used for clients who specifically request non-discretionary authority.

VOTING CLIENT SECURITIES (Item 17)

We do not participate in proxy voting on behalf of 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 type events pertaining to 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. Please 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

It is customary for our firm to exercise discretionary authority to supervise and direct the investments of client 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

Neither our management persons nor investment advisor representatives assess performance-based compensation.

Disciplinary Disclosure Reporting

Arbitration Claims. NONE
Civil Litigation, Self Regulatory Organization Proceedings, or Administrative Actions. NONE

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) and 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 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, 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 Herschel Vincent 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, Herschel Vincent Clanton, CRD No. 2772945, 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

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 16, 2020

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 taken and 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 ongoing 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, GA	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 our Brochure.

Administrative Actions or Proceedings

None. Also see Item 19 of our Brochure.

Self-Regulatory Organization (SRO) Proceedings

None. Also see Item 19 of our Brochure.

Professional Standards Violations

None.

OTHER BUSINESS ACTIVITIES (Item 4)

Investment Related

Vince Clanton is not engaged in any investment-related activity not already disclosed herein.

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)

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

SUPERVISION (Item 6)

Vince Clanton is the Chief Compliance Officer. As the chief compliance officer, he is responsible for supervising the activities of the firm's investment advisor representatives as well as the administration of operations. We administer supervision through the application of our written policies and procedures.

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 Brochure.
- 2. Awards granted or findings of liability in consequential Civil, SRO, or Administrative proceedings.**
None. See Item 19 of our 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, 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 16, 2020

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 taken and 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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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 ongoing 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 & Commercial Relationship Manager Branch Bank & Trust (BB&T) Myrtle Beach, South Carolina	2008 - 2014
Vice President NBSC/Synovus Bank, Myrtle Beach SC Myrtle Beach, South Carolina	2003 - 2008
Vice President NBSC/Synovus Bank Myrtle Beach, South Carolina	1998 - 2001

DISCIPLINARY INFORMATION (Item 3)

Criminal or Civil Actions

None. Also see Item 19 of our Brochure.

Administrative Actions or Proceedings

None. Also see Item 19 of our Brochure.

Self-Regulatory Organization (SRO) Proceedings

None. Also see Item 19 of our Brochure.

Professional Standards Violations

None.

OTHER BUSINESS ACTIVITIES (Item 4)

Investment Related

Scott T. Clanton is not engaged in any investment-related activity not already disclosed herein.

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)

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

SUPERVISION (Item 6)

Vince Clanton, Chief Compliance Officer, supervises Scott T. Clanton. We administer supervision through the application of our written supervisory policies and procedures. Questions regarding our supervisory procedures should be directed to Vince Clanton by phone at (770) 661-0283 or email to 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 Brochure.

2. Awards granted or findings of liability in consequential Civil, SRO, or Administrative proceedings.

None. See Item 19 of our Brochure.

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