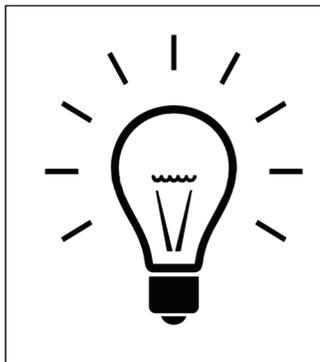


WHAT TO EXPECT WHEN WORKING WITH OUR FINANCIAL TEAM



INVESTMENT STRATEGY

AT COLUMBUS CAPITAL, WE STRIVE TO ACHIEVE RETURNS GREATER THAN INFLATION WHILE BEING RISK-AWARE. THIS REQUIRES CONSTANT EVALUATION OF APPROPRIATE RISK LEVELS FOR EACH CLIENT IN LIGHT OF CHANGING CLIENT NEEDS AND MARKET CONDITIONS.

WE MAKE TACTICAL ADJUSTMENTS TO INVESTMENTS AS NEEDED BASED ON BOTH CURRENT AND PROJECTED OUTLOOKS FOR VALUE

VS. GROWTH, CAPITALIZATION LEVELS, SECTOR ROTATION, QUALITY VS. CREDIT, AND ECONOMIC AND CORPORATE FUNDAMENTALS.

INVESTMENT MANAGEMENT TEAM

WE HAVE FIVE MEMBERS ON OUR TEAM, OWNER AND MANAGER JIM ATKINSON CFP®/AIF®/MPAS™, FINANCIAL ADVISOR MATTHEW O'HARA, AAMS® AND ADMINISTRATIVE ASSOCIATES LAURIE BAER, KELLY MONTGOMERY AND ANGELA KAUFFMAN. JIM HAS BEEN A REGISTERED FINANCIAL ADVISOR SINCE 1996 AND WITH RAYMOND JAMES SINCE 2011. MATTHEW JOINED COLUMBUS CAPITAL IN 2020 AFTER THREE YEARS WITH RAYMOND JAMES. LAURIE AND KELLY BOTH JOINED THE PRACTICE IN 2018 AFTER CAREERS IN OTHER FIELDS. ANGELA JOINED US IN THE FALL OF 2020.

INVESTMENT PROCESS

DURING CLIENT ONBOARDING WE UTILIZE AN INVESTMENT POLICY QUESTIONNAIRE. BASED UPON DISCUSSIONS DURING ONBOARDING, WE CREATE AN INVESTMENT POLICY STATEMENT AND A CUSTOM PORTFOLIO FOR EACH CLIENT. THESE CONSIDER THE CLIENTS' NEEDS, TIME HORIZON, RISK TOLERANCE, AND TAX SENSITIVITY AS WELL AS OVERALL MARKET CONDITIONS. WE WILL EVALUATE AND UPDATE THESE FACTORS AT LEAST ANNUALLY THROUGH CLIENT REVIEW CONVERSATIONS.

WE PROVIDE GOAL PLANNING AND MONITORING TO CLIENTS WITH ASSETS OVER \$100,000 AND FIND THAT LIFE EVENTS (I.E., APPROACHING RETIREMENT, MARRIAGE OR DIVORCE, BIRTH OF A CHILD, DEATH OF A SPOUSE, INHERITANCE) OFTEN TRIGGER THE NEED FOR A COMPREHENSIVE FINANCIAL PLAN. WE UPDATE OUR PLANS BIENNIALLY OR MORE FREQUENTLY AS NEEDED.

WE STRONGLY BELIEVE IN ACTIVE MANAGEMENT AND UTILIZE MUTUAL FUNDS AND SEPARATELY MANAGED ACCOUNTS (SMA) AVAILABLE THROUGH THE RAYMOND JAMES CONSULTING SERVICES PLATFORM (RJCS). WE DO NOT RECOMMEND PASSIVE STRATEGIES TO OUR CLIENTS. OUR EXPERIENCE LEADS US TO BELIEVE THAT THE RETURNS OF PASSIVE STRATEGIES FALL SHORT DURING ALMOST ALL TIME PERIODS WHEN COMPARED TO MUTUAL FUNDS AND ACTIVELY MANAGED ACCOUNTS, PARTICULARLY DURING PERIODS OF VOLATILITY.



IDEAL CLIENT

WE WORK WITH A VARIETY OF CLIENTS - BUSINESS OWNERS, RETIREES AND YOUNG PROFESSIONALS. WE SEEK CLIENTS WHOSE UNDERSTANDING OF THE WORK WE DO FITS WITH OUR OWN. WE DO NOT DAY TRADE OR MAKE SHORT TERM TRADING CALLS AND BELIEVE IN ACTIVE MANAGEMENT.

MOST OF OUR CLIENTS HAVE NEITHER THE KNOWLEDGE NOR THE TIME TO MANAGE THEIR FINANCIAL FUTURES ALONE, YET EACH REQUIRES AN INDIVIDUAL FINANCIAL PLAN. ACCORDINGLY, WE COORDINATE OUR PROFESSIONAL RECOMMENDATIONS WITH OTHER PROFESSIONALS INCLUDING ATTORNEYS, ESTATE PLANNERS, ACCOUNTANTS, INSURANCE BROKERS AND HEALTHCARE CONSULTANTS TO INSURE WE MEET THE NEEDS OF EACH CLIENT.



WHAT TO EXPECT WHEN WORKING WITH OUR FINANCIAL TEAM

FEE-BASED Vs. COMMISSIONED ACCOUNTS

WE OFFER A VARIETY OF FEE-BASED AND COMMISSIONED ACCOUNTS, EACH SELECTED BASED ON THE NEEDS OF OUR CLIENTS. FACTORS INFLUENCING THE DECISIONS REGARDING THE TYPE OF ACCOUNT WE RECOMMEND INCLUDE, BUT ARE NOT LIMITED TO:

- PURPOSE OF THE ACCOUNT
- HOLDINGS
- INVESTMENT HORIZON

WE MAY USE AMBASSADOR ACCOUNTS, FREEDOM ACCOUNTS, AND SMAS WHEN APPROPRIATE.

WE REVISIT THE FEE STRUCTURE DURING EACH CLIENT REVIEW AND MAKE CHANGES AS INDICATED BY CIRCUMSTANCES.

SMAS OFFERED THROUGH THE RJCS PROGRAM HAVE PASSED RAYMOND JAMES' RIGOROUS INITIAL AND ONGOING DUE DILIGENCE PROCESS, GIVING US ADDED CONFIDENCE IN THEM. THEY CAN BE LESS EXPENSIVE THAN MUTUAL FUNDS AND OFFER TAX EFFICIENCY FOR NON-QUALIFIED ACCOUNTS. FINALLY, WE LEVERAGE RAYMOND JAMES' COLLECTIVE ASSET POWER TO HAVE ACCESS TO SMA STRATEGIES NOT OFTEN AVAILABLE TO RETAIL CLIENTS OR TO THOSE CLIENTS AT OTHER FIRMS.

WE REVIEW AND EVALUATE A SHORT LIST OF RECOMMENDED MUTUAL FUNDS BASED ON SEVERAL CRITERIA, INCLUDING:

- MORNINGSTAR RATINGS
- STATISTICAL ANALYSIS
- CONSISTENCY IN HISTORIC PERFORMANCE
- PERFORMANCE DURING SPECIFIC MARKET PERIODS
- SECTOR ALLOCATION
- STRATEGY

IN MANY CASES, JIM ATKINSON HAS A RELATIONSHIP WITH FUND FAMILY REPRESENTATIVES WHO PROVIDE ONGOING COMMENTARY AND INSIGHT. WE DISCUSS FUND AND SMA PERFORMANCE AND OUTLOOK WITH OUR PRODUCT PARTNERS AND RAYMOND JAMES' ASSET MANAGEMENT SERVICES DEPARTMENT AS WELL. FUNDS AND FUND FAMILIES ARE EVALUATED CONTINUALLY AND WHEN MARKET CONDITIONS, FUND PERFORMANCE, STRATEGIES, AND/OR FUND MANAGEMENT CHANGE, WE ADJUST OUR RECOMMENDATIONS ACCORDINGLY.

CLIENTS WITH ASSETS OVER \$10,000 ARE ELIGIBLE FOR AMBASSADOR ACCOUNTS WHICH CAN ALLOW FOR FLEXIBLE HOLDING PERIODS, WIDE MUTUAL FUND SELECTION, THE ELIMINATION OF SOME ANNUAL FEES, AND THE ELIMINATION OF PER-TRANSACTION ADMINISTRATIVE COSTS. CLIENTS HAVE CONFIDENCE IN KNOWING THAT WE BASE OUR RECOMMENDATIONS ON THE BEST INTEREST OF THE CLIENT, NOT OUR FINANCIAL COMPENSATION.

CLIENT REVIEW

WE OFFER BOTH FEE BASED AND COMMISSION ACCOUNTS, WORKING WITH INDIVIDUAL CLIENTS TO DETERMINE WHICH RELATIONSHIP WORKS BEST FOR THEM. WE REEVALUATE THE FEE RELATIONSHIP DURING EACH PORTFOLIO REVIEW. IN SOME CASES, A CLIENT PORTFOLIO MAY INCLUDE BOTH FEE- AND COMMISSION-BASED ACCOUNTS.

IN GENERAL, WE MEET WITH COMMISSION-BASED CLIENTS TWICE A YEAR AND CONDUCT ONGOING MONITORING WITH FEE-BASED CLIENTS, MEETING WITH THEM MORE FREQUENTLY. OUR REVIEWS INCLUDE AN ASSESSMENT OF THE CLIENTS' ASSET ALLOCATION, CURRENT FINANCIAL NEEDS, CHANGES TO THE MARKET ENVIRONMENT, AND ECONOMIC PROJECTIONS AS WELL AS ANY LIFE CHANGES OR FOLLOW UP ITEMS FROM PREVIOUS REVIEW CALLS.

CURRENT CONDITIONS REQUIRE VIRTUAL MEETINGS BUT WE EXPECT TO RETURN TO FACE-TO-FACE MEETINGS AS SOON AS POSSIBLE. IN ADDITION TO REGULARLY SCHEDULED CONFERENCES, WE MAIL UPDATES THROUGHOUT THE YEAR.

WHAT TO EXPECT WHEN WORKING WITH OUR FINANCIAL TEAM

Disclosures:

Freedom Accounts, SMAs, and other strategies selected may contain Exchange Traded Funds (ETF) and/or mutual funds. Investors should carefully consider the ETF and mutual fund investment objectives, risks, charges, and expenses before investing. The prospectus contains this and other information and can be obtained from the ETF or mutual fund sponsor as well as from your financial advisor. The prospectus should be read carefully before investing.

Separately Managed Accounts (SMAs) may not be appropriate for all investors. SMA minimums are typically \$100,000 - \$250,000, may be style specific, and may be more appropriate for affluent investors who can diversify their investment portfolio.

Investing involves risk and you may incur a profit or a loss. Past performance is no guarantee of future results. There is no assurance that any investment strategy will be successful. Asset allocation and diversification does not ensure a profit or protect against a loss. It is important to review investment objectives, risk tolerance, tax objectives, and liquidity needs before choosing an investment style or manager.

In a fee-based account, clients pay a quarterly fee, based on the level of assets in the account, for the services of a financial advisor as part of an advisory relationship. In deciding to pay a fee rather than commissions, clients should understand that the fee may be higher than a commission alternative during periods of lower trading. Advisory fees are in addition to the internal expenses charged by mutual funds and other investment company securities. To the extent that clients intend to hold these securities, the internal expenses should be included when evaluating the costs of a fee-based account. Clients should periodically re-evaluate whether the use of an asset-based fee continues to be appropriate in servicing their needs. A list of additional considerations, as well as the fee schedule, is available in the firms' forms ADV Part II as well as the client agreement.