

Form ADV Part 2A Brochure

Colomb Investment Management Company, LLC

3636 South Interstate 10 Service Road, Suite 214

Metairie, LA 70001

504-520-8050

www.colombim.com

June 09, 2023

This Brochure provides information about the qualifications and business practices of Colomb Investment Management Company, LLC (CIMCO). If you have any questions about the contents of this Brochure, please contact us at 504-520-8050. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

CIMCO is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information from which you can determine whether to hire or retain an adviser.

Additional information about CIMCO is also available via the SEC's web site www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure, dated June 09, 2023, represents the annual amendment to the Brochure of Colomb Investment Management Company, LLC.

Since the filing of the firm’s last annual update Brochure on March 29, 2023, we have made minor updates but no material changes were made to our Brochure.

Pursuant to regulatory requirements, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at (504) 520-8050.

Additional information about CIMCO is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with CIMCO who are registered as investment adviser representatives of the firm.

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Item 4 – Advisory Business

Colomb Investment Management Company, LLC (CRD # 140088) (CIMCO) is registered as an investment adviser with the state of Louisiana. CIMCO is based in and organized as a limited liability company under the laws of the State of Louisiana and the United States of America. The firm has been in business since 2006 and currently has 3 employees.

CIMCO's principal office and place of business is located at 3636 South Interstate 10 Service Road, Suite 214, Metairie, LA 70001. Regular business hours are from 9:00 am to 5:00 pm Monday through Friday. The firm can be contacted by phone at (504) 520-8050 and by fax at (504) 324-0630.

Robert Colomb is the founder and President of Colomb Investment Management Company, LLC.

CIMCO provides personalized fee-based investment management to individuals, retirement plans, trusts, estates and small businesses. Investment management services may be provided by CIMCO, may be provided through third party investment managers to whom we refer accounts, or may be provided jointly by CIMCO and third party managers in the form of a "co-advisory" arrangement. When provided jointly in a co-advisory arrangement, the third party manager will provide discretionary investment management services and CIMCO will provide relationship services (including assessing investment objectives, selecting portfolio mix, etc.) to the client.

CIMCO also provides financial planning and consulting services, which may include reviewing financial objectives, asset allocation, cash flow management, tax preparation and planning, accounting services, insurance, investment management, strategies for education funding, retirement planning, and estate planning.

In addition, CIMCO provides nondiscretionary consulting services to sponsors of retirement plans. In this role, CIMCO provides plan level advisory services which may include recommending and monitoring plan investment options, assistance with participant enrollment, participant investment education, and other plan administration assistance.

Because CIMCO is a registered investment adviser, we are required to meet certain fiduciary standards when providing investment advice to clients. Additionally, when we provide investment advice related to a retirement plan account or an individual retirement account, we are considered fiduciaries within the meaning of Title I of the Employee

Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. As such, we are required to act in your best interest and not put our interest ahead of yours, even though our compensation creates some conflicts with your interests in that the more you have us manage, the more we can earn. Our clients however are under no obligation to use services recommended by our associated persons. Furthermore, we believe that our recommendations are in the best interests of our clients and are consistent with our clients' needs.

As of December 31, 2022, CIMCO managed \$500,000 in assets on a discretionary basis and was providing general oversight on approximately \$37,000,000 of assets managed by its contracted discretionary third party managers and other assets held elsewhere.

Item 5 – Fees and Compensation

Investment Management Services

As mentioned above, investment management services may be provided to clients by CIMCO, may be provided by third party investment managers to whom we refer accounts, or may be provided jointly by CIMCO and third party managers in the form of an ongoing “co-advisory” arrangement.

Related to fees, clients are generally charged based on the amount of assets under management. The total fee charged to clients, on an annual basis, may range between 0% - 2% of total assets under management depending on whether a third party manager used, the scope of the engagement, etc. In some instances, fees may be negotiable. Payment is generally due quarterly or monthly based on the value of the account at the end of the applicable period, may be billed in advance or arrears, and is generally deducted from the account (although may be billed in some cases). If terminated, a client will receive a prorated refund of any prepaid fees which are unearned and paid in advance based on the number of days of service provided during the partial period. For fees paid in arrears, fees will be charged for partial periods on a prorated basis based on the number of days of service provided during the partial period.

When services are provided directly by CIMCO, CIMCO will receive a fee directly from the client. All relevant fees will be detailed in the client agreement. When services are provided through a third party manager, CIMCO will receive from the third party adviser a percentage of the overall fee paid by the client. All relevant fees will be disclosed in the solicitor agreement and other relevant disclosure documents for solicited accounts. When

services are provided jointly by CIMCO and a third party manager in the form of a co-advisory arrangement, both CIMCO and the third party manager will receive a fee directly from the client. All relevant fees will be detailed in the three party client agreement.

Fees paid to CIMCO and third party managers are separate and unrelated to any fees or expenses assessed by mutual funds, exchange traded funds, brokers, custodians etc.

Financial Planning and Consulting Services

CIMCO may offer financial planning services to clients such as financial plans, investment plans, and/or individual consultations. Clients are typically charged a fixed fee ranging from \$1500 - \$5000, or may be charged on an hourly basis generally at \$100 - \$300 per hour, depending on the type and complexity of financial planning services to be provided. Fees are generally billed in advance, but may in some instances be partially billed in advance with the balance billed in arrears upon completion. The fees and scope of service will be documented and agreed upon before commencement of services.

Retirement Plan Consulting Services

CIMCO offers non-discretionary consulting services to sponsors of retirement plans. For these types of services, clients are typically charged an initial fixed fee of up to \$1500, and an ongoing fee of up to 0.75% of assets under advisement to be charged quarterly in arrears. Fees are negotiable and vary depending on the complexity of the engagement. The fees and scope of service will be documented and agreed upon before commencement of services.

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

CIMCO does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) and consequently does not simultaneously manage performance-based and non performance-based accounts.

Item 7 – Types of Clients

CIMCO provides service to individuals, pension and profit sharing plans, trusts, estates and small businesses.

The minimum investment required by an individual investor client is generally \$100,000. Accounts below these minimums may be negotiable and accepted on an individual basis at the firm's discretion. We may from time to time establish, modify and waive account or investment minimums for different investment products and/or services.

In addition, third party investment advisors which we use may have their own minimum investment requirements.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

CIMCO's primary investment strategy is to recommend efficient portfolios for clients managed consistent with the principles of Modern Portfolio Theory.

To implement this strategy, we generally use long term strategic approaches to investing. We may also delegate investment management responsibility to various third party managers who will employ their own strategies and methods of analysis when implementing their respective investment strategies. These managers generally use long term strategic approaches to investing as we do, but may use some shorter term tactical techniques from time to time. The selected third-party investment advisers will provide portfolio analysis, asset allocation modeling, and analysis, trading execution, general back office administration and performance monitoring as required.

Investing in securities involves risk of loss that clients should be prepared to bear. These risks include market risk, interest rate risk, currency risk, and political risk, among others.

No investment strategy can assure a profit or avoid a loss.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of the firm or the integrity of its management. CIMCO is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

Item 10 – Other Financial Industry Activities and Affiliations

Mr. Colomb offers insurance through CIMCO, and he is licensed to provide various insurance products. Mr. Colomb may receive the customary commissions paid in connection with insurance sales. However, our clients are under no obligation to purchase products recommended by our associated persons or to purchase products through our associated persons.

Mr. Colomb also recommends other investment advisors and receives compensation in connection with these referrals. The receipt of this compensation of course may give us an incentive to make recommendations based on our interests rather than yours, which is a potential conflict of interest. However, our clients are under no obligation to purchase services recommended by Mr. Colomb or the firm.

Item 11 – Code of Ethics

Individuals associated with CIMCO are permitted to buy or sell securities for their personal accounts identical to or different than those recommended to clients. However, no person is allowed to favor his or her own interest over that of a client or make personal investment decisions based on the investment decisions of advisory clients.

In order to address potential conflicts of interest, CIMCO retains records of employee personal securities activities.

Item 12 – Brokerage Practices

CIMCO does not maintain custody of client assets. Instead, we require all client assets be maintained in an account at a non affiliated “qualified custodian”, generally a broker dealer or bank, or they may be held directly at the mutual fund company(s). CIMCO is not affiliated with a brokerage firm, and no brokerage firm supervises CIMCO, its associated persons, or its activities. For accounts managed by third party managers, CIMCO does not select or recommend broker dealers to clients. All brokers are selected by the respective third party manager. While we may recommend certain brokers or custodians for

accounts we manage, you will ultimately decide whether to do so and will open your account directly with them.

When recommending brokers or custodians for its clients, CIMCO considers many different factors including quality of service, services offered, execution quality, transaction costs, reputation of the firm, financial resources, jurisdiction registration status, and stability, among others. In determining the reasonableness of a broker's compensation, we consider the overall cost to you relative to the benefits you receive, both directly and indirectly, from the broker.

Your Brokerage and Custody Costs

Our clients receive various services directly from our custodian. For our clients' accounts that our custodian maintains, the custodian generally does not charge separately for custody services but instead is compensated by charging commissions or other fees on trades that it executes or trades that are executed by other brokers to and from the custodial accounts. CIMCO's relationship to the custodian and its relationship to the client are entirely independent of trade commission assessed by the custodian in client accounts.

Since our custodians charge you a fee for each trade that we have executed by a different broker-dealer, we have the custodian execute most trades for your account in order to minimize your trading costs.

Products and Services Available to Us from Brokers/Custodians

Our custodians provides us and our clients with access to its institutional brokerage services like trading, custody, reporting, and related services, many of which are not typically available to retail customers. Our custodians also make available various support services, some of which may help us manage or administer our clients' accounts, while others may help us manage and grow our business.

Our custodians' institutional brokerage services which benefit you directly include access to a broad range of investment products, execution of securities transactions, and asset custody. The investment products available through our custodian include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Our custodian also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both the custodian's own and that of third parties. We may use this research to service all or a

substantial number of our clients' accounts, including accounts not maintained at the custodian. In addition to investment research, the custodian also makes available software and other technology that provide access to client account data, facilitates trade execution for multiple client accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

Our custodian also offers other services intended to help us manage and further develop our business. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

The availability of these services from our custodian benefits us because we do not have to produce or purchase them. Of course, this may give us an incentive to recommend that you maintain your account with our custodian based on our interests rather than yours, which is a potential conflict of interest. We believe, however, that our selection of our custodians is in the best interests of our clients, and is primarily supported by the scope, quality, and price of our custodians' services and not those services that benefit only us.

Item 13 – Review of Accounts

Reviews of Accounts

Investment management accounts are managed on an ongoing basis by CIMCO or the respective third party manager. In addition to ongoing supervision by third party managers where applicable, third party managed accounts are also generally reviewed on a quarterly basis by CIMCO. The reviews by manager generally include evaluating the employed strategy, monitoring the portfolio, and addressing the need to rebalance. Any review made by CIMCO on third party managed accounts is more general in nature. CIMCO will periodically, and at least annually, review client's investment policy and risk profile.

Additional account reviews may be triggered by a specific client request, by a change in client goals or objectives, by an imbalance in a portfolio asset allocation, or by market or economic conditions.

All ongoing clients are advised that it remains their responsibility to advise CIMCO of any changes in their investment objectives and/or financial situation.

Regular Reports Provided to Clients

Investment management clients are provided with account statements from their custodian on at least a quarterly basis which list account holdings and transactions for the period. Additionally, CIMCO may provide various other reports to clients on a case by case basis.

Item 14 – Client Referrals and Other Compensation

CIMCO does not compensate any outside parties for client referrals.

CIMCO may however receive compensation from third party investment managers in the form of referral fees. The receipt of these fees of course may give us an incentive to make recommendations based on our interests rather than yours, which is a potential conflict of interest. If a client is introduced to a third-party investment adviser by us acting as a solicitor we shall disclose the nature of the solicitor relationship, and shall provide each prospective client with a copy of our written disclosure statement and a copy of a written solicitor’s disclosure statement disclosing the terms and conditions of the arrangement between us (the solicitor) and the third party investment manager.

Item 15 – Custody

As mentioned above, CIMCO does not hold client assets but instead require that they be held by a third party “qualified custodian.” We may however have limited control in some instances to trade on your behalf, to deduct our advisory fees from your account with your authorization, or to request disbursements (although various types of written authorizations are required depending on the type of disbursements).

CIMCO is not affiliated with a custodian, and no custodian supervises CIMCO, its associated persons, or its activities.

You will receive account statements directly from your custodian at least quarterly, which will be sent to the email or postal mailing address you provided. We urge you to carefully review these custodial statements when you receive them and to compare them to reports you receive from us or our third party manager.

Item 16 – Investment Discretion

CIMCO may accept discretionary authority to manage securities accounts on behalf of clients or may require that each client investment transaction be authorized by the client. When making recommendations, CIMCO observes the written investment policies, limitations and restrictions of the clients for which it advises.

Like CIMCO, CIMCO's third party investment managers may also accept discretionary authority to manage accounts.

When granted authority to manage accounts, CIMCO's or its third party managers customarily have the authority to determine which securities and the amounts that are bought or sold. Any discretionary authority accepted by CIMCO or its third party managers however is subject to the client's risk profile and investment objectives, and may be limited by any other limitations provided by the client in writing.

Neither CIMCO nor its third party managers will not exercise any discretionary authority until it has been given authority to do so in writing. Such authority is granted in the written agreement between CIMCO, and or its third party managers and the client.

Item 17 – Voting Client Securities

CIMCO does not vote proxies on behalf of clients. To assist the client in making informed decisions, we may provide advice and answer questions related to a proxy, but the ultimate decision on how to vote a proxy is left to the client.

Item 18 – Financial Information

Registered investment advisers are required in some cases to provide certain financial information and or disclosures about their financial condition. For example, if the firm requires prepayment of fees for six months in advance, has custody of client funds, or has a condition that is reasonably likely to impair its ability to meet its contractual commitments to its clients, it must provide financial information and make disclosures.

CIMCO has no financial or operating conditions which trigger such additional reporting requirements.

Item 19 – Requirements for State-Registered Advisers

State required information regarding principals of the firm can be found in Item 4 and Part 2B of Form ADV.

State registered firms are required to make additional disclosures if a) the firm is compensated for advisory services with performance based fees, b) the firm or any of its management persons has been involved in certain types of arbitration, civil, or administrative claims, or c) the firm or any of its management persons has a relationship or arrangement with any issuer of securities.

Neither the firm nor any of its management persons has any such arrangements, nor has been involved in any such actions, which require additional disclosures.

Form ADV Part 2B Brochure Supplement

Robert L. Colomb

Colomb Investment Management Company, LLC

3636 South Interstate 10 Service Road, Suite 214

Metairie, LA 70001

504-520-8050

June 09, 2023

This Brochure Supplement provides information about Robert L. Colomb that supplements the Colomb Investment Management Advisory Company, LLC (CIMCO) Brochure which you should have received. Please contact us at (504) 520-8050 if you did not receive the CIMCO Brochure or if you have any questions about it or the contents of this supplement.

Additional information about Mr. Colomb is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Robert L. Colomb, born in 1968, formed Colomb Investment Management Company, LLC in 2006. He currently serves as President and Chief Compliance Officer of the firm.

Prior to founding the firm, Mr. Colomb served as a registered representative for O.N. Equity Sales Company from 2005 through 2008. Prior to that, he was a registered representative for Park Avenue Securities, LLC from 1999 through 2005.

Mr. Colomb attended Louisiana State University from 1986 through 1988, and attended the University of New Orleans from 1989 through 1991.

Item 3- Disciplinary Information

Mr. Colomb is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

Item 4- Other Business Activities

Mr. Colomb is licensed to provide various insurance products and services and does so through CIMCO. Mr. Colomb may receive the customary commissions paid in connection with insurance sales.

Mr. Colomb has no other financial industry activities or affiliations.

Item 5- Additional Compensation

Mr. Colomb does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients, although may qualify for such compensation when functioning in an insurance sales or referral role.

Item 6 - Supervision

Mr. Colomb founded the firm and consequently does not report to a supervisor.

Item 7- Requirements for State-Registered Advisers

State registered investment adviser representatives are required to disclose all material facts regarding certain legal, disciplinary or financial events that would be material to the evaluation of the representative. Mr. Colomb is currently not subject to, nor has ever been subject to, any legal, disciplinary or financial events of this nature.

Form ADV Part 2B Brochure Supplement

Michael O. Babin, Jr.

Colomb Investment Management Company, LLC

3636 South Interstate 10 Service Road, Suite 214

Metairie, LA 70001

504-520-8050

June 09, 2023

This Brochure Supplement provides information about Michael O. Babin, Jr. that supplements the Colomb Investment Management Advisory Company, LLC (CIMCO) Brochure which you should have received. Please contact us at (504) 520-8050 if you did not receive the CIMCO Brochure or if you have any questions about it or the contents of this supplement.

Additional information about Mr. Babin is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Michael O. Babin Jr., born in 1967, joined Colomb Investment Management, LLC in 2018 and currently serves as an Investment Advisor Representative responsible for financial planning for the firm. Mr. Babin served as self-employed insurance broker from 2008 through 2017. He also served as a Registered Representative at Park Avenue Securities from 1998 through 2007.

Mr. Babin attended Loyola University New Orleans from 1985 through 1990

Item 3- Disciplinary Information

Mr. Babin is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

Item 4- Other Business Activities

Mr. Babin is licensed to provide various insurance products and services and does so independently and through CIMCO. Mr. Babin may receive the customary commissions paid in connection with insurance sales.

Mr. Babin has no other financial industry activities or affiliations.

Item 5- Additional Compensation

Mr. Babin does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients, although may qualify for such compensation when functioning in an insurance sales or referral role.

Item 6 - Supervision

Mr. Babin reports to Robert Colomb, the founder of the firm. Mr. Colomb can be reached at the number listed above.

Item 7- Requirements for State-Registered Advisers

State registered investment adviser representatives are required to disclose all material facts regarding certain legal, disciplinary or financial events that would be material to the evaluation of the representative. Mr. Babin is currently not subject to, nor has ever been subject to, any legal, disciplinary or financial events of this nature.

Form ADV Part 2B Brochure Supplement

Mary Louise James

Colomb Investment Management Company, LLC

Located at:

2011 SE Twinbridge Circle, Ocala FL 34471

Home Office:

3636 South Interstate 10 Service Road, Suite 214

Metairie, LA 70001

504-520-8050

June 09, 2023

This Brochure Supplement provides information about Mary Louise James that supplements the Colomb Investment Management Advisory Company, LLC (CIMCO) Brochure which you should have received. Please contact us at (504) 520-8050 if you did not receive the CIMCO Brochure or if you have any questions about it or the contents of this supplement.

Additional information about Ms. James is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Mary Louise James , born in 1956, joined Colomb Investment Management, LLC in 2022 and currently serves as an Investment Advisor Representative for the firm. Ms. James has been an Investment Advisor Representative/Chief Compliance Officer and Managing Member for Touchstone Wealth Advisors, LLC from 2020 to Present. She has also been President and an Insurance Agent for SWP Group from 2012 to Present as well as Managing Member for Prime Image Design from 2006 to Present. Ms. James was an Investment Advisor Representative for McBryar Advisory Services during 2022. She was Secretary of Laurel Lake Villas Owners Association from 2015 to 2021. Ms. James was an Investment Advisor Representative for Wealth with Wisdom Advisors, Inc. from 2017 to 2021. She was President of Interfaith Foundation from 2016 to 2018 and a Board Member for Interfaith Emergency Services Corporation from 2008 to 2018. She was an Investment Advisor Representative for Park Avenue Securities, LLC from 2005 to 2017 as well as a Registered Representative for them from 2004 to 2017. Ms. James was an Agent for Guardian Life Insurance Company of America from 2004 to 2017.

Professional Designations:

Certified Financial Planner TM (CFP®)

The CFP (Certified Financial Planner) is a professional certification granted by the Certified Financial Planner Board of Standards, Inc. ("CFP Board"). To attain the right to use the CFP mark, an individual must attain a bachelor's degree from a US college or university and complete a college level course of study covering financial planning topics including insurance planning, financial management, investment planning, tax planning, retirement planning, and estate planning. CFP's must meet experience requirements and pass a comprehensive exam and are required to complete continuing education coursework and agree to be bound by the Code of Ethics and Standards of Conduct

Item 3- Disciplinary Information

Ms. James is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

Item 4- Other Business Activities

Ms. James is licensed to provide various insurance products and services and does so independently and through CIMCO. Ms. James may receive the customary commissions paid in connection with insurance sales.

Ms. James has no other financial industry activities or affiliations.

Item 5- Additional Compensation

Ms. James does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients, although may qualify for such compensation when functioning in an insurance sales or referral role.

Item 6 - Supervision

Ms. James reports to Robert Colomb, the founder of the firm. Mr. Colomb can be reached at the number listed above.

Item 7- Requirements for State-Registered Advisers

State registered investment adviser representatives are required to disclose all material facts regarding certain legal, disciplinary or financial events that would be material to the evaluation of the representative. Ms. James is currently not subject to, nor has ever been subject to, any legal, disciplinary or financial events of this nature.

Form ADV Part 2B Brochure Supplement

Thomas P. Webb

Colomb Investment Management Company, LLC

Located at:

1040 Stanton Rd. Suite D, Daphne, AL 36526

Home Office:

3636 South Interstate 10 Service Road, Suite 214

Metairie, LA 70001

504-520-8050

June 09, 2023

This Brochure Supplement provides information about Thomas P. Webb that supplements the Colomb Investment Management Advisory Company, LLC (CIMCO) Brochure which you should have received. Please contact us at (504) 520-8050 if you did not receive the CIMCO Brochure or if you have any questions about it or the contents of this supplement.

Additional information about Mr. Webb is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Thomas P. Webb, born in 1947, joined Colomb Investment Management, LLC in 2023 and currently serves as an Investment Adviser Representative responsible for the firm. Mr. Webb was previously an Investment Adviser Representative for McBryar Advisory Services, Inc., a position he held from 2018 through 2023. From 2000 to 2018 Mr. Webb was an Agent for Guardian Life Insurance Company and an Investment Advisor Representative for Park Avenue Securities, LLC.

Professional Designations:

Chartered Financial Consultant (ChFC)

The ChFC (Chartered Financial Consultant) designation is granted by the American College. To earn the designation, an individual must meet experience requirements and pass exams covering finance and investing. They must have at least 3 years of experience in the financial industry, and have studied and passed an examination on the fundamentals of financial planning, including income tax, insurance, investment and estate planning.

Chartered Life Underwriter (CLU)

The CLU (Chartered Life Underwriter) designation is granted by the American College. To earn the designation an individual must have 3 years of full-time business experience within the five years preceding the awarding of the designation. They must also complete 8 educational courses and agree to adhere to the CLU Code of Ethics. In addition, to maintain the right to continue to use the designation, an individual must complete 30 hours of continuing education every two years.

Item 3- Disciplinary Information

Mr. Webb is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

Item 4- Other Business Activities

Mr. Webb is licensed to provide various insurance products and services and does so independently. Mr. Webb may receive the customary commissions paid in connection with insurance sales.

Mr. Webb conducts his insurance business separately from CIMCO using the business name "Webb Financial Strategies".

Mr. Webb has no other financial industry activities or affiliations.

Item 5- Additional Compensation

Mr. Webb does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients, although may qualify for such compensation when functioning in an insurance sales or referral role.

Item 6 - Supervision

Mr. Webb reports to Robert Colomb, the founder of the firm. Mr. Colomb can be reached at the number listed above.

Item 7- Requirements for State-Registered Advisers

State registered investment adviser representatives are required to disclose all material facts regarding certain legal, disciplinary or financial events that would be material to the evaluation of the representative.

A summary of events for Mr. Webb is listed below:

- Subject to administrative order in 2003 issued by Alabama Securities Commission resulting in civil and administrative penalties and restitution for borrowing funds from a client and failing to execute certain trades.
- Subject to Chapter 7 bankruptcy in 1994 related to personal guarantee of business debts.
- Subject to Chapter 11 bankruptcy in 1987 related to personal guarantee of business debts.