



Form CRS
June 30, 2020

Introduction

Early McClintic McMillan, LLP ("EMCMC") is an investment advisor registered with the Securities and Exchange Commission ("SEC"). EMCMC provides advisory accounts and services. Investment advisory services and fees differ from brokerage accounts and services and it is important for you to understand these differences. This document gives you a summary of the types of services we provide and how you pay for them. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisors, brokers, and investing.

What investment services and advice can you provide me?

EMCMC offers investment advisory services to: individuals, families, high net worth individuals, retirement plan sponsors, and foundation trustees. Our services include portfolio management, financial planning, pension consulting services, the selection of third-party money managers, and Separately Managed Accounts (SMAs).

We offer discretionary and non-discretionary portfolio management. In a discretionary arrangement, EMCMC has discretion over the selection and amount of securities to be bought or sold in client accounts, subject to specified investment objectives, guidelines, or limitations set forth by each client. In a non-discretionary account arrangement, the client must approve each of our recommendations. We monitor client accounts on an ongoing basis to ensure the performance and investment strategy remains aligned with the client's stated investment goals and objectives.

As an independently owned advisor, EMCMC has an open architecture that allows us access to a wide range of investment products. EMCMC requires a minimum portfolio of \$250,000 for investment advisory clients. Different requirements apply to trust accounts offered through Raymond James Trust Services ("RJTS") and wrap fee program accounts sponsored by Raymond James Consulting Services ("RJCS"), or SMA accounts or accounts sub advised by Raymond James & Associates, Inc. ("RJA") and RJA affiliates. RJA, RJTS, and RJCS are not affiliated with EMCMC.

For additional information regarding our services and fees, please refer to Items 4 and 7 of EMCMC's Form ADV, Part 2A Brochure available at the SEC's website, www.adviserinfo.sec.gov, or by contacting us. Additional information regarding the third party manager and wrap fee program sponsor is available in their perspective's Form ADV Part 2A Brochures.

Ask your financial professional:

- **Given my financial situation, should I choose an investment advisory service? Why or why not?**
- **How will you choose investments to recommend to me?**
- **How often will you monitor my account's performance and offer investment advice?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

What fees will I pay?

EMCMC charges a quarterly asset-based fee that is dependent on the value of the assets we manage. The more assets in your account, the more you will pay in fees. Therefore we may have an incentive to encourage you to increase the assets in your account. You will generally pay additional fees related to having a brokerage account at the

custodian that holds your assets. These fees include custodial fees, brokerage commissions, transaction fees, fees charged by third party managers, and other transactional or product-level fees. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. You should be aware that other firms may provide advice on a wider range of choices at a higher or lower cost. For additional information about fees and costs, please refer to the Form ADV, Part 2A Brochure Item 5.

Ask your financial professional:

- **Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me for those fees?**
- **What additional costs should I expect in connection with my account?**

What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

As a registered investment advisor, we are fiduciaries required to act in your best interest at all times and not put our interests ahead of yours. We must eliminate conflicts or tell you about them in a way you can understand, so that you can decide whether or not to agree to them.

EMCMC does not charge performance based fees, or offer proprietary products, or engage in principal trading, or have “soft dollar,” or revenue sharing arrangements. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they affect the recommendations we provide you. As noted above, we have an incentive to recommend adding assets to any account that we manage, which increases the asset based fee you pay us.

Additionally, our relationship with RJA and RJA affiliates is material to our business. RJA and RJA affiliated entities provide our clients with custody, brokerage, wrap fee accounts, sub advisory and trust services. Our relationship with American Funds, an unaffiliated mutual fund company is also material to our business. EMCMC will generally recommend that 401K plan participants invest in American Funds. We believe that American Funds provides clients with access to a wide selection of well managed funds. Plan participants and sponsors are advised that other fund families may offer funds with higher or lower expense ratios, or with more investment options and are encouraged to review the respective fund’s prospectuses that contain

additional information regarding the fund’s commissions, fees and expenses. For a discussion of our relationship with RJA and RJA affiliates, and American Funds and any actual or potential conflicts of interest involving these entities, please refer to our Form ADV, Part 2A Brochure Items 5, 10,11,12,14.

Ask your financial professional:

- **Tell me how you and your firm make money in connection with my account. Do you or your firm receive any payments from anyone besides me in connection with my investments?**
- **What are the most common conflicts of interest in your advisory accounts? How might your conflicts of interest affect me, and how will you address them?**

How do your financial professionals make money?

Our financial professionals do not receive additional compensation or commissions for recommending certain products or services. Our financial professionals are compensated through salary and a discretionary bonus. Additionally, EMCMC’s owners participate in the firm’s profits.

Do your financial professionals have legal or disciplinary history?

There are no legal, regulatory or disciplinary events involving EMCMC or any of its financial professionals or employees. Please visit www.adviserinfo.sec.gov for a free and simple search tool to research us and our financial professionals. Also refer to the Form ADV Part 2B Brochure Supplement for additional information regarding our financial professional’s experience, qualifications and details of any disciplinary history.

Ask your financial professional:

- **Do you have any disciplinary history? For what type of conduct?**

Additional Information

For additional information about our investment advisory services, or for any questions or concerns, please contact Marc DeMarco, Chief Compliance Officer 281-491-5260 email: marcd@emcmc.com.

Ask your financial professional:

- **Who is the primary contact person for my account? What can you tell me about his or her legal obligations to me? If I have concerns about how this person is treating me, who can I talk to?**