

Thames Financial Management

Form CRS (Form ADV Part 3) – Customer Relationship Summary

Introduction

CDM Financial Counseling Services, Inc. dba Thames Financial Management is registered with the Securities and Exchange Commission as an investment advisor, and we provide investment advisory services rather than brokerage services. Investment advisory services and brokerage services and fees differ, and it is important for the retail investor to understand the differences. This document gives you a summary of the types of services that we provide and how you pay.

Please ask us for more information. Free and simple tools are available to research firms and financial professionals at <https://Investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisors, and investing.

What investment services and advice can you provide me?

We are a registered investment adviser that offers investment advisory services to retail investors. If you open an advisory account with our firm, we will meet with you to understand your current financial situation, existing resources, goals, and risk tolerance. Based on what we learn, we will recommend a portfolio of investments that is monitored at least quarterly, and if necessary, rebalanced to meet your changing needs, stated goals and objectives. We will offer you advice on a regular basis and contact you at least annually to discuss your portfolio.

You can select in our agreement whether we are allowed to buy and sell investments in your account without asking you in advance (“discretion”), or only buy and sell investments in your account after receiving your permission (“non-discretion”). If you select non-discretion, you make the ultimate decision regarding the purchase or sale of investments. Any limitations will be described in the signed advisory agreement. We will have discretion or non-discretion until the advisory agreement is terminated by you or our firm. You may cancel the agreement at any time.

Financial Consulting is also offered as a separate service for an additional flat and/or hourly fee. We do not monitor your investments for the Financial Consulting service.

We do not have minimum account size requirements.

For additional information, please see Item 4 and 7 in our Brochure (Form ADV Part 2A) for additional details, which can be found at <https://adviserinfo.sec.gov/firm/summary/126295>.

CONVERSATION STARTER – Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

What fees will I pay?

Our fees are disclosed in our Form ADV Part 1A, Item 5.E. and more fully described in our Form ADV Part 2A, Items 5.A., B., C., and D. Some fees create a conflict of interest described below and in more detail in our Firm's Form ADV, Part 2A.

- **Principal Fees and Costs:** You will pay an on-going, mutually-agreed asset-based fee after the end of each quarter for our services (as agreed in your contract), based on the value of the cash and investments in your advisory account. The more assets there are in your account, the more you will pay in fees, and the firm therefore has an incentive to encourage you to increase the assets in your account. Our standard fee is 0.75% of assets per year.
- **Other Fees and Costs:** You are responsible for all custodial and securities broker-dealer execution fees charged by the custodian and executing broker-dealer. Our asset-based fee is separate and distinct from the custodian and broker-dealer execution fees. Some investments (such as mutual funds) impose additional fees that will reduce the value of your investment over time.

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Additional Information: 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.

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (specifically Items 5.A., B., C., and D.) which can be found <https://adviserinfo.sec.gov/firm/summary/126295>.

CONVERSATION STARTER – 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?

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

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. 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 can affect the investment advice we provide you.

For instance, the more assets there are in your advisory account, the more you will pay in fees, and the firm therefore has an incentive to encourage you to increase the assets in your account. Also, recommending rollovers from retirement plan assets such as 401(k) accounts to an Individual Retirement Account (“IRA”) that is advised by our firm can increase the amount of advisory fees you will pay. In addition, arrangements with custodians of your assets also present a potential conflict of interest due to services that are beneficial to us when we recommend you use them to maintain custody of your financial assets.

CONVERSATION STARTER – How might your conflicts of interest affect me, and how will you address them?

Additional information:

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure, Items 5.A., B., C. and D.) which can be found at <https://adviserinfo.sec.gov/firm/summary/126295>.

How do your financial professionals make money?

Our financial professionals are compensated through a combination of salary and bonus. Salary is tied to the amount of client assets that the professional manages and services. Bonuses are discretionary and reflect the overall success of the firm and the individual, and therefore our financial professionals have the opportunity to earn more when opening more accounts, increasing assets and investing in riskier investments to increase their overall performance. Our financial professionals receive no product sales commissions or other forms of payment.

Do you or your financial professionals have any legal or disciplinary history?

We have no legal or disciplinary history to report. Free and simple search tools are available to retail investors who visit <https://Investor.gov/CRS> to research our firm and financial professionals.

CONVERSATION STARTER – As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

For additional information about our services, or for a copy of this disclosure, please contact:
Andrew Sawyer, VP/CCO Phone: 860-886-5108, email: andrew@thamesfinancialct.com

CONVERSATION STARTER – Ask your financial professional: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?