



THOMPSON DAVIS ASSET MANAGEMENT

Part 2B of Form ADV: Brochure Supplement

Item 1: Cover Page

Adam R. Thalhimer, CFA[®]

CRD no. 4472072

Thompson Davis Asset Management
9030 Stony Point Parkway, Suite 100
Richmond, VA 23235
804-644-6380
www.ThompsonDavis.com

This Brochure Supplement provides information about Adam R. Thalhimer that supplements Thompson Davis Asset Management's SEC Form ADV, Part 2A Brochure. You should have received a copy of that brochure. Please contact Peggy Myers Walz, Chief Compliance Officer, at the address and phone number above if you did not receive Thompson Davis Asset Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Adam R. Thalhimer is available on the SEC's website at www.adviserinfo.sec.gov.

February 19, 2021

Item 2: Educational Background and Business Experience

Adam R. Thalhimer, CFA[®], CRD no. 4472072

DOB: 1979

Education Background

Williams College
2001 BA – Political Science

Williamstown, MA

Business Background

Director of Research
Thompson Davis & Co., Inc./Thompson Davis Asset Management
10/16 – Present

Research Analyst
BB&T Securities, LLC
01/13 – 09/16

Professional Designations

Chartered Financial Analyst (CFA[®]) (9/15/2006)

CFA[®] — Chartered Financial Analyst:

The CFA[®] Charter is a globally recognized, graduate-level investment credential. Earning it demonstrates a commitment to professional ethics and expertise with the broad range of skills needed for competitive careers in the investment profession.

To earn a CFA charter, one must have four years of qualified investment work experience, become a member of CFA Institute, pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis, apply for membership to a local CFA member society, and complete the CFA Program.

CFA Program curriculum topics:

- Ethical and professional standards
- Quantitative methods
- Economics
- Financial reporting and analysis
- Corporate finance
- Equity investments
- Fixed income
- Derivatives
- Alternative investments
- Portfolio management and wealth planning

A commitment to professional ethics is at the core of CFA Institute.

CFA Institute members and CFA Program candidates are subject to professional conduct enrollment/admission criteria and must comply with the Code and Standards. Additionally, members must annually complete and sign a Professional Conduct Statement, disclosing any allegations of professional misconduct.

Item 3: Disciplinary Information

Adam R. Thalhimer does not have any material legal, financial, or other “disciplinary” items to report. You can obtain information regarding an advisor’s disciplinary history or disclosure events at www.finra.org/brokercheck or www.advisorinfo.sec.gov.

Item 4: Other Business Activities

Thompson Davis & Co. (“TD&Co.”) is dually registered as a Broker/Dealer and Registered Investment Advisor. Associated persons of Thompson Davis Asset Management (“TDAM”) also may be registered as registered representatives of TD&Co. and receive commissions based on transactions effected through TD&Co.. The Chief Compliance Officer or designee will review all transactions of related persons of the company to ensure no conflicts exist with client executions.

Employees of TDAM were involved with the formation of Seven Hills created for private investment purposes, and Seven Hills Capital Management LLC, which serves as the general partner (GP) for Seven Hills Capital Partners, LP (“Seven Hills” or the “LP”). TDAM has been appointed by the GP to serve as the Portfolio Manager of Seven Hills. The GP is controlled by William D Davis Jr., the Fund’s portfolio manager, who is also an employee of TDAM. Due to the relationship between the LP, TDAM and the GP, a conflict of interest exists that can cause personnel of these entities to suggest investments in either the LP or Separately Managed Accounts (“SMAs”) over other investment alternatives. This conflict of interest also could lead an advisor to suggest switching assets from a SMA to the LP, or vice versa, if the advisor perceives a higher level of compensation will result from the other investment. Interests in the LP will not be registered under the U.S. Securities Act of 1933 (“Securities Act”) or the securities laws of any state or other jurisdiction. Interests will be offered and sold in the United States to sophisticated investors under the exemptions provided by Section 4(2) of the Securities Act and Regulation D. The LP will not be registered under the Investment Company Act of 1940 in reliance upon the exemption provided by Section 3(c) (1) of that Act.

The day-to-day investment decisions for Seven Hills will be made by Portfolio Managers that include the same employees primarily responsible for managing certain individual SMAs. The Portfolio Managers may follow similar or different investment strategies for the LP as they follow for other client portfolios.

While Portfolio Managers will use their best efforts to provide the LP and other client portfolios with suitable investment opportunities, it is possible that Portfolio Managers might not present the LP and other client portfolios with the same investment opportunities that come to their attention, even if such opportunities are consistent with the LP’s and other clients’ investment objectives. Portfolio Managers will use their best judgment and specific knowledge of the LP and client accounts when determining which securities to recommend or invest in specific instances.

Because Portfolio Managers manage multiple accounts for different groups of clients, it is possible that some clients could be placed at a disadvantage with respect to the timing of trading decisions and/or the price of securities. Moreover, as described in **Item 6** of TDAM’s Brochure, it is perceived that there is an incentive to favor a performance account over other client portfolios because the performance accounts pay a performance-based incentive fee to TDAM. However, TDAM believes that such conflict of interest is limited because the investment objectives and strategies of the LP are different from that of many client portfolios, and TDAM has developed policies and procedures to monitor the fair allocation of investments between all accounts. Nevertheless, TDAM and the Portfolio Managers will attempt to resolve any actual or perceived conflicts of interest in a manner consistent with TDAM’s fiduciary duties.

In some instances, we could recommend a specific mutual fund to you and receive compensation from that fund for your investment. This represents a conflict of interest as an advisor has a financial interest in recommending a particular fund. To address this conflict, your Investment Adviser Representative and/or a supervisor reviews client accounts to ensure they are consistent with your stated needs, objectives, and financial situation.

Item 5: Additional Compensation

None of the individuals mentioned in this supplement receive any additional compensation from any party or source when providing services to our Clients.

They may receive salary and bonus compensation from TD&Co. as employees. TDC pays all general expenses of TDAM such as HR, benefits, salary, bonus, office rent, telephones, etc.

Item 6: Supervision

The individual listed in this supplement is an experienced businessperson and industry professional. This person determines and executes their respective responsibilities as documented in our extensive written supervisory policies and procedures, which include the periodic review of client portfolios against stated investment objectives.

TDAM has adopted, and periodically updates, a compliance manual that outlines for each employee the rules and regulations to which they must adhere. TDAM has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to these rules and regulations. In addition, TDAM has adopted a Code of Ethics that requires each employee to act in the best interest of clients at all times.

As CEO, William D. Davis Jr. is responsible for the supervision, strategy, and direction of TD&Co.. TDAM also employs a Chief Compliance Officer, Peggy Myers Walz, who has supervisory duties over all associated persons of our firm. Should you have questions related to these activities, please contact Ms. Walz; she is available at the address and phone number listed in this supplement as well as pwalz@thompsondavis.com.

Item 7: Requirements for State-Registered Advisers

TDAM is an SEC-registered investment adviser; therefore, this section is not applicable.