Item 1 - Cover Page

Form ADV Part 2A

Compass Wealth Management, LLC

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February 17, 2022 Brochure

This brochure provides information about the qualifications and business practices of Compass Wealth Management, LLC ("Compass"). If you have any questions about the contents of this brochure, please contact us at (678) 619-2364 or **lance.miller@compasswm.net.** The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Additional information about Compass also is available on the SEC's website at **www.AdviserInfo.sec.gov**.

Item 2 - Material Changes

Registered Investment Advisers are required to use this format in order to inform clients of the nature of advisory services provided, types of clients served, fees charged, conflicts of interest and other information. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any change to our policies, practices, or conflicts of interest made since our last annual update. This Summary is provided to all clients within 120 days of our fiscal year-end. Of course, the complete Brochure is available to clients at any time upon request.

Our last annual update was filed on March 10, 2021. Since that time, we have made the following changes to our brochure:

July 2021

- Beau Davis, former Managing Partner, is no longer affiliated with Compass. His information was removed from this brochure.

February 2022

- Item 4--- When making rollover recommendations, and for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we provide an acknowledgment that when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Our brochure may be requested free of charge by contacting Lance Miller, Chief Compliance Officer, at (678) 619-2364 or lance.miller@compasswm.net. Additional information about Compass Wealth Management, LLC is also available via the SEC's website www.adviser.sec.gov. The website also provides information about any persons affiliated with Compass Wealth Management, LLC who are registered, or are required to be registered, as investment adviser representatives of Compass Wealth Management, LLC.

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Item 4 - Advisory Business

General Information
Compass Wealth Management, LLC was formed in 2011 and provides financial planning and portfolio management services to its clients. At the outset of each client relationship, Compass spends time with the client, asking questions, discussing the client's investment experience and financial circumstances, and reviewing options for the client. Based on its reviews, Compass generally develops with each client:

- a financial outline for the client based on the client's financial circumstances and goals, and the client's risk tolerance level (the "Financial Profile"); and
- the client's investment objectives and guidelines (the "Investment Plan").

The Financial Profile is a reflection of the client's current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments Compass will make on behalf of the client in order to meet those goals. The Profile and the Plan are discussed regularly with each client, but are not necessarily written documents.

Financial Planning
Compass offers financial planning services to those clients in need of such service in conjunction with Portfolio Management services. Compass's financial planning services normally address areas such as general cash flow planning, retirement planning, and insurance analysis. The goal of this service is to assess the financial circumstances of the client in order to more effectively develop the client's Investment Plan. Financial Planning is not offered as a stand-alone service or for a separate fee, but is typically provided in conjunction with the management of the portfolio.

Portfolio Management
As described above, at the beginning of a client relationship, Compass meets with the client, gathers information, and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by Compass based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, Compass will manage the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, Compass will have the authority to supervise and direct the portfolio without prior consultation with the client.

Notwithstanding the foregoing, clients can impose certain written restrictions on Compass in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments (e.g., "sin stocks") in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance differ and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of Compass. Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

Educational Seminars/Workshops
Our Advisory Representatives may conduct financial education seminars or workshops on topics such as estate planning, investment strategies, and retirement needs. We may partner with attorneys and other professionals to offer these seminars. Seminar participants may subsequently choose to participate in a complimentary initial consultation with us. The consultation will consist of a general review of your financial situation, issues, and concerns. We will also explain the services we offer.

IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are 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. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

IRA Rollover Considerations

As part of our consulting and advisory services, we provide you recommendations and advice concerning your employer retirement plan or other qualified retirement account. Our recommendations may include you consider withdrawing the assets from your employer's retirement plan or other qualified retirement account and roll the assets over to an individual retirement account ("IRA"). Further, we offer our management services be applied to those funds and securities rolled into an IRA or other account for which we will receive compensation. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as described above under Item 5. This practice presents a conflict of interest because persons providing investment advice have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by us.

It is important for you to understand many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

1. Leave the funds in your employer's (former employer's) plan.
2. Move the funds to a new employer's retirement plan.
3. Cash out and taking a taxable distribution from the plan.
4. Roll the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage it is important you understand the following:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
    a. Employer retirement plans generally have a more limited investment menu than IRAs.
    b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
    a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
    b. You should understand the various products and services you might take advantage of at an IRA provider and the costs of those products and services.
    c. It is likely you will not be charged a management fee and will not receive ongoing asset management services unless you elect to have such services. In the event your plan offers asset management or model management, there may be a fee associated with the services that is more or less than our asset management fee.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may offer financial advice, guidance, and/or model management or portfolio options at no additional cost.
5. If you keep your assets titled in a 401k or retirement account, you could delay your required minimum distribution beyond age 72.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.

a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult an attorney if you are concerned about protecting your retirement plan assets from creditors.

7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they

qualify for an exception such as disability, higher education expenses or the purchase of a home.

9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. If you elect to roll the assets to an IRA that is subject to our management, we will charge you and asset based fee as described below in Item 5. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

Principal Owners

Robert A. Amato is the sole owner of Compass. Please see ***Brochure Supplements***, Appendix A, for more information on Robert and other individuals who formulate investment advice and have direct contact with clients, or have discretionary authority over client accounts.

Type and Value of Assets Currently Managed

As of December 31, 2022, Compass managed approximately $180,098,980 assets on a discretionary basis. We do not offer asset management services on a non-discretionary basis.

Item 5 - Fees and Compensation

General Fee Information

Fees paid to Compass are exclusive of all custodial and transaction costs paid by the client to the client's custodian, brokers or other third party consultants. Please see ***Item 12 - Brokerage Practices*** for additional information. Fees paid to Compass are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, Compass and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

The broker/dealer recommended by Compass offers various securities (typically limited to open ended mutual funds) with no transaction fees assessed if the particular securities are traded. However, there is a holding period required or a transaction charge will be assessed by the broker/dealer. Compass does not share in the transaction fees. The holding period will range from 90 days to six months. Compass does not purchase or sell securities based on the security having no transaction fees and does not decide to hold a security longer as a result of a security not satisfying the holding period.

Portfolio Management Fees
For Equity and Balanced Portfolios (Growth, Moderate and Conservative Asset Allocation Models), the annual fee schedule is based on a percentage of assets under management as follows:

First $500,000	1.50%
Next $500,000	1.25%
Next $1,000,000	1.00%
Next $3,000,000	0.85%
Over $5,000,000	0.75%

For Fixed Income allocation accounts, the annual fee schedule is also based on a percentage of assets under management as follows:

First $500,000	1.15%
Next $500,000	1.00%
Next $1,000,000	0.85%
Next $3,000,000	0.75%
Over $5,000,000	0.50%

Compass at its discretion, negotiates special fee arrangements where Compass deems it appropriate under the circumstances. Compass will household a client's accounts to determine fees

Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. Fee adjustments will be made the following quarter for any inflows or outflows, per event (i.e. inflows/outflows are not aggregated for the quarterly period) occurring in the account if the deposit/withdrawal is at least $30,000. Fees are normally debited directly from client account(s), unless other arrangements are made.

Either Compass or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to Compass from the client will be invoiced or deducted from the client's account prior to termination.

Educational Seminars/Workshops
We do not charge a fee to attend our educational seminars.

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

Compass does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Compass has no performance-based fee accounts, it has no side-by-side management.

Item 7 - Types of Clients

Compass' typical clients are high net worth individuals. Compass also serves small businesses.

In general, we require a minimum of $500,000 per household to open an advisory account. At our discretion, we may waive this minimum account size. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. We will also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

Methods of Analysis

In accordance with the Investment Plan, Compass generally selects mutual funds and exchange traded funds (ETF's) for client accounts.

Mutual funds and ETFs are generally evaluated and selected based on a variety of factors, including, without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

Fixed income investments are used as a strategic investment when deemed appropriate by Compass, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. Compass evaluates and selects individual bonds or bond funds based on a number of factors including, without limitation, rating, yield and duration.

Investment Strategies

Compass utilizes four basic asset allocation models: growth, moderate, conservative and fixed. The specific investments for each individual client will vary depending upon the unique circumstances of the client.

Based on the macro view of the equity and fixed income markets, and taking into consideration the specific risk tolerance and objectives of each client, Compass determines the most appropriate exposure to each type of asset class, such as cash and equivalents, fixed income and equity allocation.

Compass applies this analysis and invests each client account in accordance with the Investment Plan for that client.

Risk of Loss

While Compass seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

Management Risks. While Compass manages client investment portfolios based on Compass's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested.

Accordingly, client investment portfolios are subject to the risk that Compass allocates assets to asset classes that are adversely affected by unanticipated market movements, and the risk that Compass's specific investment choices will from time to time underperform their relevant indexes.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, Compass will invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

Equity Market Risks. Compass will from time to time invest portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that can spread can help mitigate some risks of the investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

Fixed Income Risks. Compass invests portions of client assets directly into fixed income instruments, when deemed appropriate, such as bonds and notes, or invests in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Foreign Securities Risks. Compass invests portions of client assets into pooled investment funds that invest internationally, when deemed appropriate. While foreign investments are important to the diversification of client investment portfolios, they carry risks that are different from U.S. investments. For example, foreign investments are not subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

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 a client's evaluation of Compass or the integrity of Compass' management. Compass has no disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

Please see ***Item 5 - Fees and Compensation*** for more information.

Compass does not have a related person who is a broker-dealer or other similar type of broker or dealer, investment company or other pooled investment vehicle, other investment adviser or financial planner, futures commission merchant or commodity pool operator, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, or sponsor or syndicator of a limited partnership.

Compass and its Advisory Representatives are not actively engaged in any other financial industry entity.

Compass does not recommend the services of a Third-Party Manager.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics and Personal Trading

Compass has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Compass's Code has several goals. First, the Code is designed to assist Compass in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, Compass owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires Compass associated persons to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Compass's associated persons (managers, officers and employees). Under the Code's Professional Standards, Compass expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Compass associated persons are not to take inappropriate advantage of their positions in relation to Compass clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time Compass's associated persons invest in the same securities recommended to clients. Under its Code, Compass has adopted procedures designed to reduce or eliminate conflicts of interest that this causes. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

Compass maintains policies regarding participation in initial public offerings (IPOs) and private placements in order to comply with applicable laws and avoid conflicts with client transactions. If a Compass associated person wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer. If associated persons trade with client accounts (e.g., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Compass's written policy.

Item 12 - Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, Compass seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, Compass uses or recommends the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Consequently, there is no guarantee that Compass will achieve the most favorable execution of transactions and will cost the client more money. Not all investment advisers require or recommend their clients to direct brokerage to a particular broker/dealer. Research services received with transactions include proprietary or third party research (or any combination), and are used in servicing any or all of Compass's clients. Therefore, research services received are not exclusively used for the account for which the particular transaction was affected.

Compass recommends clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets. Compass affects trades for client accounts at Schwab, or in some instances, consistent with Compass's duty of best execution and specific agreement with each client, elect to execute trades elsewhere. Although Compass recommends clients establish accounts at Schwab, it is ultimately the client's decision to custody assets with Schwab. Compass is independently owned and operated and is not affiliated with Schwab.

Schwab provides Compass with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as Compass maintains a pre-established minimum amount of client assets in accounts at Schwab Advisor Services. These services are not soft dollar arrangements, but are part of the institutional platform offered by Schwab. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Compass client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab Advisor Services also makes available to Compass other products and services that benefit Compass but does not directly benefit its clients' accounts. Many of these products and services are used to service all or some substantial number of Compass accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist Compass in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of Compass's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Advisor Services also offers other services intended to help Compass manage and further develop its business enterprise. These services include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab makes available, arrange and/or pay third-party vendors for the types of services rendered to Compass. Schwab Advisor Services from time to time discounts or waives fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Compass. Schwab Advisor Services also provides other benefits such as educational events or occasional business entertainment of Compass personnel. In evaluating whether to recommend that clients custody their assets at Schwab, Compass takes into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a conflict of interest.

Directed Brokerage

Clients can direct Compass to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation results in certain costs or disadvantages to the client, either because the client will pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangement that Compass has with Schwab is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing Compass to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Compass that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

Aggregated Trade Policy

Compass typically directs trading in individual client accounts as and when trades are appropriate based on the client's Investment Plan, without regard to activity in other client accounts. However, from time to time, Compass aggregates trades together for multiple client accounts, most often when these accounts are being directed to sell the same securities at the same time. If such an aggregated trade is not completely filled, Compass will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by Compass or its officers, directors, or employees will be excluded first.

Item 13 - Review of Accounts

Managed portfolios are reviewed at least quarterly, but can be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Compass. These factors include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Robert Amato, Compass's Managing Partner, reviews all accounts. Generally, the holdings in each of Compass' model allocations are reviewed on a daily basis.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, Compass provides at least an annual report for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at the request of the client. The client should compare any report received from Compass with the statements received direct from the account custodian.

Item 14 - Client Referrals and Other Compensation

As noted above, Compass receives some benefits from Schwab based on the amount of client assets held at Schwab. Please see ***Item 12 - Brokerage Practices*** for more information. However, neither Schwab nor any other party is paid to refer clients to Compass.

Item 15 - Custody

Schwab is the custodian of nearly all client accounts at Compass. From time to time however, clients can select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify Compass of any questions or concerns. Clients are also asked to promptly notify Compass if the custodian fails to provide statements on each account held.

Your Custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from Schwab will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

From time to time and in accordance with Compass's agreement with clients, Compass will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there will be small differences due to the timing of dividend reporting and pending trades.

Item 16 - Investment Discretion

As described above under ***Item 4 - Advisory Business***, Compass manages portfolios on a discretionary basis. This means that after an Investment Plan is developed for the client's investment portfolio, Compass will execute that plan without specific consent from the client for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving Compass the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client; and, the withdrawal of advisory fees directly from the account. Compass then directs investment of the client's portfolio using its discretionary authority. The client can limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with Compass and the requirements of the client's custodian. The discretionary relationship is further described in the agreement between Compass and the client.

Item 17 - Voting Client Securities

As a policy and in accordance with Compass's client agreement, Compass does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact Compass with questions relating to proxy procedures and proposals; however, Compass generally does not research particular proxy proposals.

Item 18 - Financial Information

Compass does not require nor solicit prepayment of more than $1,200 in fees per client, six months or more in advance and therefore has no disclosure required for this item.

Item 19 - Requirements for State Registered Advisers

This section is not applicable to Compass. Compass is not state registered. Compass is registered with the Securities and Exchange Commission.

Item 20 Additional Information

Trade Errors

In the event a trading error occurs in your account, Compass' policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.