

**FORM ADV****Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

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Name of Investment Adviser: <b>Compak Asset Management, Inc.</b>						
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:
	8105 Irvine Center Drive # 1100	Irvine	CA	92618		949-679-2500

**This part of FORM ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any government authority.**

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(Schedule A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.**

Applicant: Compak Asset Management, Inc.

SEC File Number:

801- 58081

Date:

02/09/2009

**1. A. Advisory Services and Fees.** (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

**Applicant:**

- |                                     |     |  |    |   |
|-------------------------------------|-----|--|----|---|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services .....   | 65 | % |
| <input type="checkbox"/>            | (2) | Manages investment advisory accounts not involving investment supervisory services.....  |    | % |
| <input checked="" type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above...  | 1  | % |
| <input type="checkbox"/>            | (4) | Issues periodicals about securities by subscription .....  |    | % |
| <input type="checkbox"/>            | (5) | Issues special reports about securities not included in any service described above.....   |    | % |
| <input type="checkbox"/>            | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities..... |    | % |
| <input checked="" type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities...   | 34 | % |
| <input type="checkbox"/>            | (8) | Provides a timing service .....  |    | % |
| <input type="checkbox"/>            | (9) | Furnishes advice about securities in any manner not described above.....   |    | % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- |    |   |                                     |                          |
|----|---|-------------------------------------|--------------------------|
|    |   | Yes                                 | No                       |
| B. | Does applicant call any of the services it checked above financial planning or some similar term? . . . . . | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**C.** Applicant offers investment advisory services for: (check all that apply)

- |                                     |     |  |                                     |     |                   |
|-------------------------------------|-----|--|-------------------------------------|-----|-------------------|
| <input checked="" type="checkbox"/> | (1) | A percentage of assets under management      | <input type="checkbox"/>            | (4) | Subscription fees |
| <input type="checkbox"/>            | (2) | Hourly charges                               | <input checked="" type="checkbox"/> | (5) | Commissions       |
| <input checked="" type="checkbox"/> | (3) | Fixed fees (not including subscription fees) | <input checked="" type="checkbox"/> | (6) | Other             |

**D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

**2. Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- |                                     |    |                                  |                                     |    |   |
|-------------------------------------|----|----------------------------------|-------------------------------------|----|---|
| <input checked="" type="checkbox"/> | A. | Individuals                      | <input checked="" type="checkbox"/> | E  | Trusts, estates, or charitable organizations                    |
| <input type="checkbox"/>            | B. | Banks or thrift institutions     | <input checked="" type="checkbox"/> | F. | Corporations or business entities other than those listed above |
| <input type="checkbox"/>            | C. | Investment companies             | <input type="checkbox"/>            | G. | Other (describe on Schedule F)                                  |
| <input checked="" type="checkbox"/> | D. | Pension and profit sharing plans |                                     |    |   |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities                                       | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                             | <input checked="" type="checkbox"/> I. Options contracts on:               |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter                     | <input checked="" type="checkbox"/> (1) securities                         |
| <input checked="" type="checkbox"/> (3) Foreign issuers  | <input checked="" type="checkbox"/> (2) commodities                        |
| <input type="checkbox"/> B. Warrants   | <input type="checkbox"/> J. Futures contracts on:                          |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input checked="" type="checkbox"/> (1) tangibles                          |
| <input type="checkbox"/> D. Commercial paper   | <input checked="" type="checkbox"/> (2) intangibles                        |
| <input checked="" type="checkbox"/> E. Certificates of deposit                                 | <input type="checkbox"/> K. Interests in partnerships investing in:        |
| <input checked="" type="checkbox"/> F. Municipal securities                                    | <input type="checkbox"/> (1) real estate                                   |
| <input checked="" type="checkbox"/> G. Investment company securities:                          | <input type="checkbox"/> (2) oil and gas interests                         |
| <input checked="" type="checkbox"/> (1) variable life insurance                                | <input checked="" type="checkbox"/> (3) other (explain on Schedule F)      |
| <input checked="" type="checkbox"/> (2) variable annuities                                     | <input checked="" type="checkbox"/> L. Other (explain on Schedule F)       |
| <input checked="" type="checkbox"/> (3) mutual fund shares                                     |  |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

- |   |   |
|---|---|
| (1) <input checked="" type="checkbox"/> Charting  | (4) <input type="checkbox"/> Cyclical                                 |
| (2) <input type="checkbox"/> Fundamental          | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical |   |

B. The main sources of information applicant uses include: (check those that apply)

- |   |   |
|---|---|
| (1) <input type="checkbox"/> Financial newspapers and magazines               | (5) <input type="checkbox"/> Timing services                                |
| (2) <input type="checkbox"/> Inspections of corporate activities              | (6) <input type="checkbox"/> Annual reports, prospectuses, filings with the |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | Securities and Exchange Commission  |
| (4) <input type="checkbox"/> Corporate rating services                        | (7) <input type="checkbox"/> Company press releases                         |
|   | (8) <input type="checkbox"/> Other (explain on Schedule F)                  |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |   |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input checked="" type="checkbox"/> Option writing, including covered options,<br>uncovered options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days)                 | (7) <input checked="" type="checkbox"/> Other (explain on Schedule F)   |
| (4) <input checked="" type="checkbox"/> Short sales  |   |

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**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ..... ☐ Yes ☒ No

(If yes, please describe these standards on Schedule F)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

**7. Other Business Activities.** (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☒ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☒ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- ☐ C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |   |   |
|---|---|
| <input checked="" type="checkbox"/> (1) broker-dealer   | <input type="checkbox"/> (7) accounting firm  |
| <input type="checkbox"/> (2) investment company   | <input checked="" type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser   | <input checked="" type="checkbox"/> (9) insurance company or agency                           |
| <input type="checkbox"/> (4) financial planning firm  | <input checked="" type="checkbox"/> (10) pension consultant                                   |
| <input checked="" type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                                    |
| <input type="checkbox"/> (6) banking or thrift institution  | <input checked="" type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.. ☒ Yes ☐ No

(If yes, describe on Schedule F the partnerships and what they invest in.)

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**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☒ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sell for itself securities it also recommended to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment advisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other condition for starting or maintaining an account?

Yes No  
☒ ☐

(If yes, describe on Schedule F)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory account, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Mr. Moeez Ansari of Compak Asset Management reviews the accounts of all clients when initially established with the firm. The Investment Committee (IC) reviews the individual security investments held by Compak Asset Management's managed accounts on a regular and continuous basis. The IC is comprised of Moeez Ansari (CEO) and Feroz Ansari (COO). Managed investment advisory accounts are assigned to one or more Investment Advisors Representatives ("IAR") of Compak who review the accounts on an ongoing basis at the direction of IC to see that the accounts continue to conform to the investment strategy selected by the client in an effort to reach the client's goals. The IC continues to direct the strategies that are applied to clients accounts through the ongoing review of the IAR.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Client portfolios that Compak Asset Management provides investment supervisory services will receive transaction confirmations as they occur directly from the custodian or broker/dealer. Summary reports of portfolio holdings and all transaction within the account shall be provided quarterly. All or a portion of these reports may be prepared and distributed by the account custodian.

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  |                                     |                          |
|--|-------------------------------------|--------------------------|
|  | Yes                                 | No                       |
| (1) securities to be bought or sold? .....           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of securities to be bought or sold? ..... | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? .....               | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? .....                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ..... ☒ Yes ☐ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- |   |                                     |                          |
|---|-------------------------------------|--------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... | Yes                                 | No                       |
|   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes                                 | No                       |
|   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?..... ☐ Yes ☒ No

## Schedule F

1A.	<p>Compak Asset Management, Inc. (“Compak”) provides investment supervisory services to advisory clients (“Clients”) and may also provide advisory services to Clients on matters not involving securities, which include commodities, consulting assignments, life and long term care insurance.</p> <p>Compak Asset Management may from time to time accept consulting assignments from its clients. The compensation may include a monthly retainer and/or a one time fee. The Client and Compak Asset Management will enter into a written agreement that describes the specific services and expected costs.</p>
	<p><u>Investment Supervisory Services</u></p> <p>Investment supervisory services are provided through Management and Advisory Accounts, described in more detail below, in which the Client grants Compak the discretion to invest Client assets in those securities which Compak reasonably believes will achieve the stated investment objectives of the Client. Compak will generally utilize an asset allocation strategy in which Client assets are allocated among investments in various asset classes such as stocks, bonds and cash or cash equivalents. Compak will base its asset allocation upon several factors, including the goals and objectives of the Client, fundamental analysis, technical analysis and market timing strategies. The allocation of assets within the client portfolio is monitored and adjusted on an ongoing basis to attempt to position the portfolio to experience market gains or avoid market declines. These portfolio asset allocation adjustments will change the portfolio from its original portfolio allocation. Compak uses as one of its portfolio management tools, the theory of diversification through asset classes to try to meet clients objective, the firm also uses technical analysis of the market to determine how the model portfolio should be altered to best achieve the client’s goals. Based on movements and future expectation the firm will move in and out of certain sectors and may from time-to-time even keep a significant portion of the client’s assets in cash. Compak at its discretion may invest a portion of its clients’ portfolios in negatively correlated mutual funds. Negatively correlated mutual funds may rise in value while the general stock market declines. Compak may add these negatively correlated mutual funds in an attempt to reduce the volatility of a client’s portfolio. The addition of negatively correlated investments does not in any way guarantee that the volatility, draw down or loss of portfolio principal will be lower and it may actually reduce long-term portfolio performance. Though Compak will generally invest Client assets in mutual funds that are representative of these various asset classes, it may also invest Client assets in equity and debt securities and in a “laddered” portfolio government securities and corporate debt securities of varying maturities.</p>

	<p>Compak provides investment supervisory services under the careful guidance and supervision of the Investment Committee (“IC”) and through its various Investment Advisor Representatives (“IARs”). The IC is comprised of Moez Ansari (CEO) and Feroz Ansari (COO). Each IAR, when meeting with a prospective advisory Client, will obtain information from the Client concerning the Client’s financial and tax status, prior investment experience, risk tolerance and financial objectives. Compak has developed a questionnaire, which an IAR will frequently ask a prospective Client to complete, that is designed to elicit this information.</p> <p>Compak generally offers its investment supervisory services to Clients who place assets with a value of at least \$150,000 under Compak management. Compak believes that the above-referenced amount is the minimum account value that can best take advantage of the full range of Compak’s analytical strategies. In this “Standard Account”, Compak selects from different asset allocation models to manage Client assets in accordance with the goals and objectives and instructions of the Client.</p> <p>Beginning in February 2003, Compak began offering its Value Account to Clients who open their accounts with assets with an aggregate value that is less than \$150,000. In the Value Account, Compak attempts to determine a Client’s investment objective from among four different categories. Compak will then invest Client assets in general accordance with an asset allocation strategy that meets the investment objective and restrictions given by the client.</p>
	<p>A Client, who wishes to retain Compak to perform investment supervisory services, whether through the Standard Account or the Value Account, will enter into an Investment Management Agreement with Compak. Pursuant to investment discretion granted to Compak, the Client’s assets will be deposited into a custodial account (“Client Account”) to be invested and thereafter monitored by the IC as well as the IAR. Unless the Client directs otherwise, Compak will arrange for custodial accounts to be established at Fidelity Institutional Brokerage Group and for Clients to open commodities accounts at ADM Investor Services. The IC will review and approve each proposed allocation of Client assets as well as those investments that an IAR proposes to make on behalf of a Client. Each IAR will no less than annually, and more frequently as either requested by the Client or dictated by market conditions, contact each Client to discuss their financial condition as well as any changes to their goals and objectives. With the prior approval of the IC, each IAR may adjust the Client’s asset allocations as well as any investments made on behalf of the Client based upon market trends, market conditions, the analytical tools used by Compak or changes in the goals and objectives of the Client. Either the Client or Compak may terminate an Investment Management Agreement at any time, provided that the terminating party provides thirty days prior written notice of its intention to terminate to the</p>



	other party. Compak, may, however, decide to waive this notice requirement.
1B	<p><u>Financial Planning</u></p> <p>Some clients are provided a written plan that may include a personal balance sheet and certain projections. All reports, financial statement projections and analyses are intended exclusively for the clients use in developing and implementing their financial plan. In view of this limited purpose, the statements should not be considered complete financial statements. We will not audit (examine), review or compile such statements and, accordingly we will not express an opinion or other form of assurance on them, including the reasonableness of assumptions and other data on which any prospective financial statements are based. It is likely that there will be differences between projected and actual results because events vary and circumstances frequently do not occur as expected and such differences may be material.</p> <p>Our analyses will be highly dependent on certain economic assumptions about the future. Therefore, the client should establish familiarity with historical data regarding key assumptions such as inflation and investment rates of return, as well as an understanding of how significantly these assumptions affect the results of our analyses. We may counsel the client as to the consistency of his/her assumptions with relevant historical data, but we will not express any assurance as to the accuracy or reasonableness of your specific data and assumptions. The client is ultimately responsible for the assumptions and personal data upon which our procedures and projections are based. The financial plan assumptions and reports are primarily a tool to alert clients to certain possibilities. The reports are not intended to or do they provide any guaranty about future events including an individual's investment returns. The implementation of the plan is solely your responsibility.</p>
1C	For its investment supervisory services, Compak will charge its Clients an account management fee and an account maintenance fee for both the Standard Account and the Value Account; a Client who establishes a Value Account will also be charged a one-time non-refundable account set-up fee of 2.75% of the initial account value upon the execution of the Investment Management Agreement. A detailed explanation of each of these advisory fees is set forth below:
	<p><u>Account Management Fee</u></p> <p>A Client who has established a Value Account will, at the end of each calendar quarter, be assessed an Account Management Fee for the forthcoming calendar quarter of .625% of the market value of the Client assets under management. Notwithstanding the above, if at the end of any calendar quarter, the market value of assets in a Value Account equals or exceeds \$150,000, then the Account Management Fee for said Client shall henceforth be determined in accordance with the fee schedule for the Standard Account set forth immediately below.</p>

	<p>At the end of each calendar quarter, each Client who has established a Standard Account will be assessed a tiered Account Management Fee for the forthcoming calendar quarter based upon the value of the Client assets under management in this account. This fee will be calculated in accordance with the following schedule.</p> <table> <tr> <th><b>Market Value of Standard Account Assets</b></th><th><b>Quarterly Asset Based Fee</b></th></tr> <tr> <td>\$500,000 or less</td><td>.50%</td></tr> <tr> <td>plus \$500,001 to \$1,000,000</td><td>.375%</td></tr> <tr> <td>plus \$1,000,001 to \$2,500,000</td><td>.25%</td></tr> <tr> <td>plus \$2,500,001 to \$5,000,000</td><td>.1875%</td></tr> <tr> <td>plus \$5,000,001 and above</td><td>.15%</td></tr> </table> <p>As an example, a Standard Account with \$3,000,000 under management at the end of a calendar quarter will be charged an Account Management Fee of .50% of the first \$500,000 under management, .375% of the next \$500,000 under management, .25 of the next \$1,500,000 under management and .1875% of the final \$500,000 under management.</p> <p>Compak may, in its discretion, discount those Account Management Fees described above.</p>	<b>Market Value of Standard Account Assets</b>	<b>Quarterly Asset Based Fee</b>	\$500,000 or less	.50%	plus \$500,001 to \$1,000,000	.375%	plus \$1,000,001 to \$2,500,000	.25%	plus \$2,500,001 to \$5,000,000	.1875%	plus \$5,000,001 and above	.15%
<b>Market Value of Standard Account Assets</b>	<b>Quarterly Asset Based Fee</b>												
\$500,000 or less	.50%												
plus \$500,001 to \$1,000,000	.375%												
plus \$1,000,001 to \$2,500,000	.25%												
plus \$2,500,001 to \$5,000,000	.1875%												
plus \$5,000,001 and above	.15%												
	Compak will generally value the assets in Client Accounts in accordance with the methodologies utilized by either the broker-dealer that is acting as custodian for the Client's account or, in the case of mutual funds purchased and held by the fund on behalf of the Client, the published Net Asset Value of such funds.												
	The Client Account will be valued on the last business day of the calendar quarter. Clients will then be mailed an invoice that states the Account Management Fee owed by the Client to Compak and how Compak calculated this fee. If Compak receives no objection to this fee from the Client within five days of the date of the invoice, then Compak shall collect this fee by debiting the Client Account; where appropriate, Compak may redeem mutual funds or sell securities in order to collect this fee.												
	In cases where the Investment Management Agreement is either established or terminated during the calendar quarter, the Account Management Fee will be prorated, as appropriate. Thus, the Account Management Fee will be assessed from the date that the Investment Management Agreement is accepted by Compak and, where such an Agreement is terminated during the calendar quarter, an appropriate pro rata refund will be given to the Client.												
	Where additional deposits are made to the Client Account by the Client												

	during the calendar quarter or if a Client withdraws assets from the Client Account during the quarter, Compak may, but is not obligated to, prorate the Account Management Fee with respect to such deposits or withdrawals.
	<p><u>Account Maintenance Fee</u></p> <p>Compak also charges an Account Maintenance Fee of \$45 per calendar quarter for each Client Account. The Account Maintenance Fee is assessed in advance at the beginning of each calendar quarter. The Client will receive an invoice for the Account Maintenance fee, which may be consolidated with an invoice for the Asset Management Fee. If the Client does not object to this fee to Compak within five days of the date of the invoice, Compak shall collect this fee by debiting the Client Account. In the event that the Investment Management Agreement is terminated during the calendar quarter, Compak shall provide a pro rata refund of such fee to the Client. Where appropriate, Compak may redeem mutual funds or sell securities in order to collect this fee. Compak may, at its discretion, waive all or part of, the Account Maintenance Fee.</p>
	<p><u>Value Account Set-Up Fee</u></p> <p>A Value Account will be charged a one-time non-refundable fee of 2.75% of the value of the account assets on the effective date of the Investment Management Agreement between Compak and the Client. Compak will send the Client an invoice for this fee promptly after the execution of the Investment Management Agreement between the Client and Compak and if the Client does not object to this fee within five days of the date of the invoice, Compak will collect this fee by debiting the Client Account.</p>
	<p>The above-referenced fees charged by Compak do not include brokerage commissions and other costs related to the execution of transactions on behalf of Clients. Such costs will be paid by advisory Clients in addition to the fees discussed above. Moreover, mutual funds that are held by advisory Clients will bear their own internal transaction and execution costs, as well as directly compensate their investment managers along with internal administrative services. Some mutual funds pay 12b-1 fees, Distribution Fees, and or Shareholder Service Fees to broker-dealers that offer such mutual funds to their Clients. These charges affect the Net Asset Value of these mutual fund shares and are thus indirectly borne by mutual fund shareholders such as a Compak Client. Some mutual fund companies have imposed a redemption fee. A redemption fee is another type of fee that some funds charge their shareholders when shares are sold or redeemed within a short period of time from the purchase of the mutual fund shares. Although a redemption fee is deducted from redemption proceeds just like a deferred sales load, it is not considered to be a sales load. Unlike a sales load, which is generally used to compensate brokers, a redemption fee is typically used to defray fund costs associated with a shareholder's redemption and is paid directly to the fund, not to a broker. The SEC generally limits redemption fees to 2%. In most cases, the Funds will use the "first-in, first-out" (FIFO)</p>

	<p>method to determine the holding period. Under this method, the date of the redemption will be compared with the earliest purchase date of shares held in the account. While it is not the general practice of Compak to sell client's securities in a period that would generate a redemption fee, it should be anticipated that Compak might do so if in its opinion the sale is in the client's best interests. Or mutual fund shares must be redeemed to pay fees from the account.</p> <p>A complete explanation of these charges is contained in the prospectus and "Statement of Additional Information" for each mutual fund. You can get a prospectus from the mutual fund company (through its website or by telephone or mail). Your financial professional or broker can also provide you with a copy.</p>
	<p>The IARs of Compak, as well as Mr. Ansari, may be employed by a broker-dealer and in such capacity may receive a portion of the 12b-1 fees and or account service fee paid by mutual funds to such broker-dealer(s) on account of a Client's holdings of such funds. Because of the financial incentive that 12b-1 fees, Distribution Fees, and or Shareholder Service Fees represent to individuals and entities affiliated with the investment advisor, a potential conflict of interest exists between the client and Compak Asset Management and individuals acting on its behalf.</p> <p>Compak Asset Management has entered into an "Investment Advisor Custodial Support Services Agreement" with Fidelity, whereby Compak Asset Management is responsible for providing back office, administrative, custodial support, and clerical services for Fidelity accounts. In return for these services, on an annual basis, Fidelity pays Compak Asset Management a portion of applicable client non-retirement assets in custody with Fidelity. The receipt of compensation under the support services agreement creates a financial incentive for Compak Asset Management to recommend Fidelity as the custodian of client assets. The financial incentive creates a potential conflict of interest between Compak Asset Management and the client.</p>
1A, 1C & 3	<p><u>Advice Not Involving Securities</u> <u>Commodities</u></p> <p>Compak Alternative Investments, LLC is affiliated through common ownership and control with Compak Asset Management, Inc. Compak Alternative Investments is registered as a Commodity Trading Advisor ("CTA") with the National Futures Association ("NFA"). Some of Compak Asset Management's Investment Advisor Representatives, as well as Mr. Moez and Feroz Ansari, are registered as Associated Persons of this CTA, Compak Alternative Investments, LLC.</p> <p>Compak Asset Management, Inc. offers investment supervisory services to certain qualified Clients who separately acknowledge to Compak that they</p>

	<p>understand and accept the pertinent risks of investing in commodity futures and options on commodity futures contracts. Compak Asset Management may suggest that certain Clients allocate a portion of their assets to a commodities account that Compak Alternative Investments, LLC will trade on behalf of the Client. Clients wishing to obtain these services will establish an account at Archer Daniels Midland Company, ADM Investor Services, Inc. and grant trading authorization to the CTA, Compak Alternative Investments, LLC who will invest Client assets in this commodities account on behalf of such Client. Neither Compak Asset Management nor its affiliates will not charge an Account Management Fee, an Account Maintenance Fee or an Account Set Up Fee for these services. Compak and its associated persons, including Mr. Moez and Feroz Ansari, Associated Persons who are also employees of Compak Asset Management, Inc. will receive a portion of the commissions that a Client pays with respect to transactions effected on his or her behalf. Thus, such compensation will be based upon the frequency of transactions that it effects for Clients and may create a potential conflict of interest between the client and Compak and its associated persons that encourages the active trading of commodity accounts.</p> <p>Compak Asset Management, Inc. or its IARs may introduce Clients to Compak Alternative Investment, LLC and/or Compak Capital Opportunities, LLC an affiliated fund managed by an affiliated company. The owners and control persons of Compak Asset Management, Inc. have a financial interest in the fund and an incentive to introduce clients to the potential investment. Please refer to the Compak Capital Opportunities, LLC disclosure in this document.</p> <p><u>Compak Capital Opportunities, LLC</u>  Compak Alternate Investments, LLC and Compak Investments, LLC are both affiliated with Compak Asset Management, Inc. through common ownership and control with Compak Asset Management, Inc. Compak Alternative Investments, LLC provides services and is the Trading Advisor to the affiliated company Compak Capital Opportunities, LLC (the Fund.) Compak Investments, LLC provides services and is the Manager of the Fund.</p> <p>The principal investment objective of the Fund is to realize capital appreciation on its assets while managing the risk associated with the Fund's trading strategy. There can be no assurance that the Fund's investments will be successful or that its objectives will be attained. Accordingly, investment in the Fund is speculative in nature and suitable only for sophisticated investors who are aware of the risks involved. The investment strategy of the Fund is to trade short option positions on stock indexes futures. The Fund may trade other futures and futures options contracts and may also invest in equities, bonds, mutual funds and exchange traded funds. This disclosure in not a solicitation of or an offer for the sale of any security but rather a</p>
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	<p>disclosure of the potential conflicts of interest between the Client and the affiliated companies of Compak Asset Management.</p> <p><u>Consulting Assignments</u></p> <p>From time-to-time Compak Asset Management, Inc. may perform specialized consulting services on a fixed fee basis. Clients and Compak Asset Management will enter into a written agreement describing the services and a projected term and cost. These services may include developing strategies relating to securities or other investments held by the Clients. These services are unique to each Client and not provided to all Clients.</p>
1A, 1C & 3	<p><u>Insurance</u></p> <p>Compak may suggest the purchase of life insurance or long term care policies. Mr. Ansari, as well as the various IARs of Compak, have been appointed as agents of various insurance companies and may offer life insurance, annuities (fixed and variable), and long-term care insurance to prospective Clients. Mr. Ansari, as well as the various IARS, will receive commissions with respect to any such policies that are purchased by Clients.</p> <p>Compak has entered into an agreement with an insurance Brokerage General Agent. The Brokerage General Agent assists Compak with insurance case design, advanced underwriting expertise and illustrations. In addition to the sales commission earned by the insurance agent for an insurance product sale, Compak will receive a marketing allowance from the Brokerage General Agent. The type and volume of insurance premiums paid on insurance products placed through the Brokerage General Agent determines the amount of the marketing allowance payments. The marketing allowance payments are a financial incentive to recommend insurance products to clients. The financial incentive creates a potential conflict of interest between the client and Compak.</p>
4(A)	<p><u>Methods of Analysis and Investment Strategies</u></p> <p>Compak uses the strategies of “Asset Allocation” and “Portfolio Optimization” on behalf of Clients. Compak believes that by allocating assets among various classes of investments, a Client can enhance or optimize their investment returns, especially when compared to a portfolio that consists only of one asset class. These investment strategies attempt to find a balance between risk and return for a Client using historical performance of each asset class as a guide. Compak uses market timing strategies as well as fundamental and technical analyses and information obtained from the Client to develop the investment strategy that it believes will provide the Client with the greatest potential return consistent with that Client’s risk tolerance. The asset allocation or make up of the client portfolio will change from time to time depending upon the stock market, overall economy and the decisions of Compak Asset Management.</p>

4(C)(7)	<p>As discussed above, Compak may suggest that certain of its Clients establish a separate account in which Compak will have investment discretion to engage in trading commodity futures and options thereon on behalf of Clients. Compak believes that these types of investments can provide Clients who understand the speculative nature of such investments with performance potential that may not correlate with the traditional securities markets.</p> <p>Compak will not generally recommend these investments to its Value Accounts.</p>																				
6.	<p><u>Education and Business Background:</u></p> <p><u>Moez Ul-Haq Ansari</u>  <u>Born:</u> 1957  <u>Education:</u> Fullerton College 01/1974 To 12/1976  West Coast University 03/1977 To 03/1978</p> <p><u>Business Background for last five years:</u></p> <table> <tr> <td>Compak Asset Management</td> <td>12/1999 To Present</td> </tr> <tr> <td>Compak Securities, Inc.</td> <td>12/2002 To Present</td> </tr> <tr> <td>Multiple Financial Services, Inc.</td> <td>01/2003 To 10/2003</td> </tr> <tr> <td>Triad Advisors, Inc.</td> <td>02/2001 To 4/2002</td> </tr> <tr> <td>Sentra Securities Corporation</td> <td>10/1999 To 2/2001</td> </tr> </table> <p><u>Feroz Ansari</u>  <u>Born:</u> 1968  <u>Education:</u>  Thunderbird, The American Graduate School of International Management  Masters of International Management 01/1992 To 12/1993  University of Karachi  Masters of Business Administration 07/1989 To 08/1992</p> <p><u>Business Background for last five years:</u></p> <table> <tr> <td>Compak Asset Management, Inc.</td> <td>07/2002 To Present</td> </tr> <tr> <td>Compak Securities, Inc.</td> <td>12/2002 To Present</td> </tr> <tr> <td>Compak Alternative Investments, LLC</td> <td>12/2006 To Present</td> </tr> <tr> <td>Compak Investments, LLC</td> <td>12/2006 To Present</td> </tr> <tr> <td>Emirates Bank International</td> <td>10/1996 To 07/2002</td> </tr> </table>	Compak Asset Management	12/1999 To Present	Compak Securities, Inc.	12/2002 To Present	Multiple Financial Services, Inc.	01/2003 To 10/2003	Triad Advisors, Inc.	02/2001 To 4/2002	Sentra Securities Corporation	10/1999 To 2/2001	Compak Asset Management, Inc.	07/2002 To Present	Compak Securities, Inc.	12/2002 To Present	Compak Alternative Investments, LLC	12/2006 To Present	Compak Investments, LLC	12/2006 To Present	Emirates Bank International	10/1996 To 07/2002
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Item 7	<p><u>Other Business Activities</u></p> <p>Compak Asset Management, Inc. is registered as an Introducing Broker with the NFA and Mr. Moez and Feroz Ansari, as well as some of Compak Asset Management's Investment Advisor Representatives, have been appointed as agents of various insurance companies. Investment Advisor Representatives of Compak Asset Management, Inc. may recommend the purchase of products or services, such as insurance, commodities or planning services, other than investment advice to Clients. The Investment Advisor Representatives may receive compensation if the client chooses to by a</p>																				

	<p>product or services from the IAR or affiliated entity. Clients are not required to implement insurance or planning advice through Compak Asset Management, Inc. or an affiliated company.</p> <p>Compak Asset Management is not a registered broker dealer. An affiliate of Compak Asset Management, Compak Securities Inc. is registered as a broker dealer. Compak Securities Inc. is approved by all appropriate regulatory authorities to act as a broker dealer. Some Client transactions may be routed by Compak on behalf of Clients to Compak Securities Inc. for execution. Compak Securities, Inc. will receive transaction-based compensation in connection with such transactions and Rule 12b-1 fees and or account service fee from mutual funds held on behalf of Clients. Mr. Moez and Feroz Ansari as well as some of its Investment Advisor Representatives are registered representatives of Compak Securities Inc. Compak understands and hereby discloses to potential and current Clients that such compensation creates a potential conflict of interest where Compak may be encouraged to invest Client assets in those mutual funds that pay Rule 12b-1 fees and or account service fee.</p> <p>Feroz Ansari performs services for the affiliated companies Compak Securities, Inc., Compak Alternative Investments, LLC, and Compak Investments, LLC. The majority of Feroz Ansari's time is devoted to the operation and administration of Compak Asset Management, Inc.</p>
Item 8	<p><u>Other Financial Industry Activities or Affiliations</u></p> <p>Compak Capital Opportunities, LLC</p> <p>Compak Capital Opportunities, LLC is a Delaware Limited Liability Company formed to allow investors to invest in commodities and other assets through their ownership of Compak Capital Opportunities, LLC. (the "Fund") The Limited Liability Company Interests (the "Interests") being offered by through an Offering Memorandum are offered privately, only to financially sophisticated high net worth individuals and entities that satisfy all of the investor suitability and other requirements set forth herein and in the Fund's Subscription Agreement.</p> <p>Compak Capital Opportunities, LLC is managed by Compak Investments, LLC (the "Manager"). Compak Investments, LLC is registered with the Commodity Futures Trading Commission (the "CFTC") as a commodity pool operator and is a member of the National Futures Association (the "NFA") in that capacity. The Manager manages the Fund's non-investment related activities.</p> <p>Compak Alternative Investments, LLC (the "Trading Advisor") has been appointed as the Fund's Trading Advisor. The Trading Advisor is registered with the CFTC as a commodity trading advisor and is a member of the NFA in that capacity. The Trading Advisor will conduct all of the Fund's</p>



	<p>investing.</p> <p>Compak Investments, LLC and Compak Alternative Investments, LLC are affiliated through common ownership and control with Compak Capital Management, Inc. the investment advisor. Because the Manager and the Trading Advisor are compensated in various ways for their services to Compak Capital Opportunities, LLC and therefore the owners of these entities benefit, Compak Capital Management has a financial incentive to introduce a prospective client to the Fund. Because of this financial incentive a potential conflict of interest exists between the Client and Compak Capital Management, Inc. (the Advisor)</p>
8C, & 9B	<p>Mr. Moez Ansari is the owner of and a principle of the broker-dealer Compak Securities, Inc. In such capacity he and other Compak Asset Management, Inc. employees serving as Principals or Registered Representatives of Compak Securities, Inc. may receive a portion of the Rule 12b-1 fees and or account service fee paid by mutual funds to Compak Securities, Inc because of a Client's security holdings. Compak and the Client understand and acknowledge that such compensation creates a potential conflict of interest where Compak may be encouraged to invest Client assets in those mutual funds that pays Rule 12b-1 fees and or account service fee.</p> <p>In addition, as noted above, Mr. Moez and Feroz Ansari as well as Compak's Investment Advisor Representatives may receive sales commissions on insurance policies purchased by Clients and may also receive a portion of transaction charges arising from commodities transactions effected on behalf of certain Clients.</p> <p>Compak has an arrangement with Strategic Legal Services and refers its clients to Strategic Legal Services for Estate Planning needs. Strategic Legal Services may also refer some of its clients to Compak for Asset Management.</p> <p>Compak has an arrangement with Hess Verdon and Associates (HVA) and refers its client to HVA for Estate Planning needs. HVA may also refer some of its clients to Compak for Asset Management.</p> <p>Compak has an arrangement with Brown &amp; Streza and refers its clients to Brown &amp; Streza for Estate Planning needs. Brown &amp; Streza may also refer some of its clients to Compak for Asset Management.</p> <p>Compak has an arrangement with Sinchak &amp; Associates and refers its clients to Sinchak &amp; Associates for Estate Planning needs. Sinchak &amp; Associates may also refer some of its clients to Compak for Asset Management.</p>

	<p>Compak has an arrangement with Sacks Tierney P.A. Attorneys and refers its clients to Sacks Tierney P.A. Attorneys for Estate Planning needs. Sacks Tierney P.A. Attorneys may also refer some of its clients to Compak for Asset Management.</p> <p>Compak has a relationship with The Geller Group for Clients interested in Retirement Plan Administration and ERISA Counsel.</p> <p>Compak has a relationship with Benefits Street for Clients interested in Retirement Plan Administration and ERISA Counsel.</p> <p>Compak does not share any portion of investment advisory fees or commissions with HVA, Brown &amp; Streza, The Geller Group, or Benefits Street. Compak does not receive a portion of the fees that HVA, Brown &amp; Streza, The Geller Group, or Benefits Street charge.</p>
Item 8D	<p>Related persons of the Advisor are affiliated with a limited liability company that clients are introduced to for consideration. Please refer to the disclosure and description of Compak Capital Opportunities, LLC, Compak Investments, LLC, and Compak Alternative Investments, LLC (all affiliated entities) above in this document.</p>
9D, 9E	<p><u>Participation or Interest in Client Transactions</u></p> <p>Compak Asset Management, Inc. will likely purchase securities for Clients that are also owned by the firm's associated persons. Clients should be aware that orders placed for the purchase and sale of securities may also include orders for the same securities on behalf of one or more of Compak's Clients as well as one or more of its associated persons. In addition, Clients should be aware that, under certain circumstances, Compak may either buy or sell securities for some Clients and not for others.</p> <p>In order to address the potential conflicts of interest that may arise in connection with such transactions, Compak has established a formal policy governing the handling of such transactions.</p> <p>In order to meet its fiduciary duties to all of its Clients, Compak will allocate investment opportunities among all Clients over a period of time on a fair and equitable basis. As a general rule shareholders, directors, officers, members, employees and agents of Compak are required to postpone all securities transactions for their own account until approval is given for such transactions by Mr. Moez Ansari or his designee.</p> <p>Compak monitors the securities trading activities of all of its employees which includes a quarterly review by Mr. Feroz Ansari or his designee of reports of such trading activities by such persons and their immediate familiarities (living in the same household) during the preceding quarter. In</p>

	<p>addition, should an associated person of Compak maintain a securities trading account, Compak would receive and review copies of such person's monthly statement provided by that broker-dealer as well as confirmations of trades effected in such Client's brokerage accounts to enable Compak to review the securities transactions and holdings of employees. In the rare instance when an employee has the opportunity and wishes to purchase in initial public offering or a private placement, that employee must receive approval from Compak. Compak's Code of Ethics requires any employee learning of a breach of the company's code of ethics to report it immediately to company management. Compak will provide a copy of the Company's Code of Ethics to clients or perspective clients upon written request.</p> <p>Compak Asset Management, Inc. or its IARs may introduce Clients to Compak Capital Opportunities, LLC an affiliated fund managed by an affiliated company. The owners and control persons of Compak Asset Management, Inc. have a financial interest in the fund and an incentive to introduce clients to the potential investment. Please refer to the Compak Capital Opportunities, LLC disclosure earlier in this document.</p> <p><u>Proxy Voting</u> Compak will not vote proxies for securities held in the Account, unless otherwise directed by Client and such responsibility is accepted in writing. Normally the ERISA clients appoint pension plan trustees or other fiduciaries to vote proxies.</p>
10	<p><u>Conditions for Managing Accounts</u> Generally Compak will only accept Standard Accounts if the initial account value is greater than \$150,000. Accounts smaller than \$150,000 are normally only accepted and managed as Value Accounts. Value accounts are normally not accepted if the initial account value is less than \$50,000. Compak may at its discretion accept or retain accounts smaller than the stated minimum.</p>
12(A)	<p><u>Investment or Brokerage Discretion</u> Compak buys and sells securities for its Client's accounts based on a limited power of attorney granted by the Client. There are no restrictions on which securities or the amount of such securities that can be purchased or sold, by Compak on behalf of the Client.</p> <p>Compak is normally granted the power and authority in its sole discretion to select brokers or dealers to execute purchases and sales of securities for the account(s) of the Client.</p> <p>Neither Compak nor any principal, employee, or IAR will have the authority to withdraw funds nor take custody of Client funds or securities other than for the collection of Client authorized investment advisory fees as discussed</p>

	<p>herein and certain funds of Compak Capital Opportunities, LLC.</p> <p>Compak Asset Management, Inc. or its affiliated entities may have the discretionary authority to determine commissions charged on securities and commodities transactions and may do so at its sole discretion.</p>
12(B)	<p><u>Suggested Brokers or Dealers</u></p> <p>Unless the Client directs otherwise, Compak will arrange for Clients to establish securities brokerage accounts or custodial relationships with Fidelity Institutional Brokerage Group (“Fidelity”) and their commodities accounts with ADM Investors Services (“ADM”). Compak will periodically review the services provided by both Fidelity and ADM, including the reasonableness of commissions and other trading costs, execution capabilities, computer trading support and such other factors as may be deemed to be relevant by Mr. Moez Ansari.</p>
13(A)	<p><u>Additional Compensation</u></p> <p>Compak and its associated persons will receive a portion of the commissions related to commodities transactions effected by the Firm on behalf of its Clients. Mr. Moez and Feroz Ansari and some Investment Advisor Representatives are agents of various life insurance companies and will receive commissions related to life insurance policies purchased by Clients. Mr. Moez and Feroz Ansari and some Investment Advisor Representatives of Compak Asset Management are associated with the affiliated broker-dealer Compak Securities, and in such capacity may receive a portion of Rule 12b-1 fees and or account service fee paid by some mutual funds to such broker-dealer because of the mutual funds owned by Clients.</p> <p>Compak may require that clients establish brokerage accounts with the Institutional Brokerage Group of Fidelity Investments, Inc. (Fidelity), a registered broker-dealer, Member SIPC/NYSE, to maintain custody of clients’ assets and to effect trades for their accounts. Fidelity Institutional Brokerage Group provides Compak with access to its institutional trading and operations services, which are typically not available to Fidelity retail investors. These services generally are available to independent investment advisors at no charge to them so long as a significant amount of the advisor’s clients’ account assets are maintained at Fidelity. Fidelity Institutional Brokerage Group’s services include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment. Fidelity Institutional Brokerage Group also makes available to Compak other products and services that benefit Compak but may not benefit its clients’ accounts. Some of these other products and services assist Compak in managing and administering clients’ accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade</p>

	<p>execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of Compak's fees from its clients' accounts, and assist with back-office support, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Compak's accounts. Fidelity Institutional may also provide Compak with other services intended to help Compak manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Fidelity may make available, arrange and/or pay for these types of services to Compak by independent third parties. Fidelity may discount or waive 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 Compak.</p> <p>Compak Asset Management has entered into an "Investment Advisor Custodial Support Services Agreement" with Fidelity, whereby Compak Asset Management is responsible for providing back office, administrative, custodial support, and clerical services for Fidelity accounts. In return for these services, on an annual basis, Fidelity pays Compak Asset Management a portion of applicable client non-retirement assets in custody with Fidelity. The receipt of compensation under the support services agreement creates a financial incentive for Compak Asset Management to recommend Fidelity as the custodian of client assets. The financial incentive creates a potential conflict of interest between Compak Asset Management and the client.</p> <p>Compak Asset Management, Inc. (the Advisor) may introduce Clients to Compak Capital Opportunities, LLC (the Fund). The fund is managed and traded by entities owned and/or controlled by owners or control persons of the Advisor. As the Fund Manager and Trader will receive compensation for their services to the Fund, their owners will benefit creating a financial incentive for individuals to invest in the Fund. The financial incentive creates a potential conflict of interest between the Client and the investment advisor Compak Asset Management, Inc.</p>
13B	<p>Compak Asset Management has professional relationships with law firms and retirement plan administrators where they will refer potential clients between themselves. No direct or indirect (financial) compensation is paid or received.</p> <p><u>Solicitation Relationships</u></p> <p>Compak has entered into written investment solicitation agreements with another investment advisor ("Solicitor"). Compak pays the other investment advisor ("Solicitor") on the basis of investment management fees received by Compak Asset Management, Inc. from clients referred by the other investment advisor. The Client will receive a Solicitation Disclosure</p>

	<p>Statement that describes the nature of the relationship between Compak Asset Management, Inc, other advisor and the Client no later than when they enter an investment advisory agreement with Compak Asset Management, Inc. The Solicitation Disclosure Statement discloses that the Solicitor has a financial incentive to make successful referrals to Compak Asset Management, Inc. This financial incentive creates a potential conflict of interest between the Solicitor and the potential client of Compak Asset Management, Inc.</p>
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