

**CAPITAL ASSET ADVISORY
SERVICES LLC
WEALTHMARK PROGRAM
ACCOUNTS**

WealthMark Program Brochure

Sponsored by:
Capital Asset Advisory Services, LLC
15744 South Peacock Road
Haslett, MI 48840
(517) 339-7662

This brochure provides clients with information about Capital Asset Advisory Services, LLC (“Capital Asset Advisory Services, LLC”) and the Capital Asset Advisory Services, LLC’s WealthMark (the “Program”). You should consider the information in this brochure carefully before becoming a Program client. Please note that this information has not been approved or verified by any governmental authority.

Table of Contents

Program Description	2
Capital Asset Advisory Services, LLC Plan	2
Capital Asset Advisory Services, LLC Services.....	2
Brokerage and Custody	3
Program Fees	3
About Capital Asset Advisory Services LLC and its Affiliations	4-6

Program Description

Capital Asset Advisory Services, LLC's WealthMark Program has been designed to connect Capital Asset Advisory Services, LLC's clients with professional in-house money managers and investment vehicles suitable for their financial circumstances and investment objectives. In addition, Program clients will receive additional services such as a written comprehensive lifetime financial plan updated annually and basic income tax preparation.

Capital Asset Advisory Services, LLC Plan

At the beginning of each client relationship, Capital Asset Advisory Services, LLC prepares a Plan for the client. The Plan may include Capital Asset Advisory Services, LLC's recommendations regarding one or more of the following: investment portfolio analysis, design and performance reports, cash flow projections, retirement planning, education funding, estate planning, tax planning, employee benefits review, risk management and insurance. In connection with the Plan or after it is complete, clients may request that Capital Asset Advisory Services, LLC assist them to implement their Plans using the Program.

Capital Asset Advisory Services, LLC Services

Capital Asset Advisory Services, LLC's WealthMark Program Accounts. The Capital Asset Advisory Services, LLC's WealthMark Assets will be managed by Capital Asset Advisory Services, LLC on a discretionary basis. Capital Asset Advisory Services, LLC will review the WealthMark Assets on a regular and continuous basis and make recommendations as Capital Asset Advisory Services, LLC deems appropriate. Capital Asset Advisory Services, LLC typically recommends mutual funds that are appropriate given the client's financial circumstances and investment goals for the WealthMark Program Accounts, but may also recommend other securities or money management programs from time to time. Capital Asset Advisory Services, LLC selects mutual funds for inclusion in its recommended list of funds based on style, past performance, experience and track records of fund managers, and risk ratings as established by independent rating services. Capital Asset Advisory Services, LLC's recommendations of other securities will be based on the client's particular needs and Capital Asset Advisory Services, LLC's independent review of the appropriateness of the securities to assist the client to meet those needs.

Because the WealthMark Program Accounts will be managed on a discretionary basis, Capital Asset Advisory Services, LLC will not implement any recommendation without the client's prior approval. Capital Asset Advisory Services, LLC will act as the Client's agent to implement such recommendation in accordance with Client's instructions. The client agrees to review trade confirmations received from the client's custodian and notify Capital Asset Advisory Services, LLC immediately of any errors.

WealthMark Accounts accounts are classified as either (1) actively managed accounts or (2) tactical allocation accounts. They are defined as follows:

- 1) Actively managed accounts are reviewed daily by the Portfolio Manager and are actively traded based on target allocations and investment strategies set with the client. WealthMark Accounts allow for continuous professional money management by our in-house experienced staff.
- 2) Tactical allocation accounts use an active management portfolio strategy that rebalances the percentage of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors using advisor guide buying signals from momentum. The client could be fully invested in both actively managed and tactical allocation accounts based on the Investment Policy Counsel's decision.

Brokerage and Custody of Program Accounts

Capital Asset Advisory Services, LLC will direct transactions for WealthMark Program Accounts to such broker-dealers as they may select, unless the client gives specific directions otherwise. In directing or recommending brokerage, Capital Asset Advisory Services, LLC seeks “best execution” for client accounts, which is a combination of a number of judgmental factors including price, execution quality and client needs. Recognizing the value of these judgmental factors, brokers selected or recommended may charge commissions that are higher than the lowest commissions that might otherwise be available.

Capital Asset Advisory Services, LLC has a relationship with TD Ameritrade Institutional, a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade will provide custody and execution services in accordance with the terms set forth in your agreement. Capital Asset Advisory Services, LLC reasonably believes that in the case of managed accounts, TD Ameritrade, Inc.'s blend of execution services, commission and transaction costs as well as professionalism allows Capital Asset Advisory Services, LLC to seek best execution and competitive prices.

Program Fees

The annual Program Fees payable to Capital Asset Advisory Services, LLC is as follows:

Client Assets Under Management	Fee (as a percentage of assets) (Minimum Amount Required: \$100,000)
Any Amount	2.25%

What services are covered by the Program Fees? The Program Fees pay for Capital Asset Advisory Services, LLC's advisory services to clients under the Program, administrative expenses of the Program, custody charges for clients custodied at TD Ameritrade, Inc. and brokerage services for Program accounts to the extent trades are conducted through TD Ameritrade.

What services are not covered by the Program Fees? The Program Fees do not cover brokerage to the extent trades are conducted through brokers or dealers other than TD Ameritrade and custody charges if clients are custodied anywhere other than TD Ameritrade. Finally, the Program Fees do not include expenses of mutual funds that may be included in the client's portfolio.

How are fees charged? Program fees are charged quarterly in advance. If management begins after the start of a quarter, Program Fees will be prorated accordingly. If a client terminates its agreement with Capital Asset Advisory Services, LLC, then any balance due to either party shall be settled in a reasonable time frame.

Is there a minimum fee and are fees negotiable? Program accounts are not subject to a minimum annual fee but clients are required to invest a minimum amount of \$100,000 in the Program. In some instances fees and minimums may be negotiable, at the discretion of Capital Asset Advisory Services, LLC.

Additional Information about Program Fees. Capital Asset Advisory Services, LLC generally does not offer the services provided under the Program separately. However, clients may be able to purchase services similar to those offered under the Program from other service providers either separately or as part of a similar

wrap fee program. These services or programs may cost more or less than the Program, depending on the fees charged by such other service providers.

About Capital Asset Advisory Services LLC and its Affiliations

Key Personnel

Anthony Mazzali, Mark Parker, Jeffrey Casey, Jon Cohen, Mark Redfield and Brett Rhoades are the key members of the firm. Jon Cohen manages all WealthMark Program Assets as further described in Schedule F of Form ADV. He conducts daily reviews of all client accounts.

Education and Business Standards

All individuals that give investment advice on behalf of Capital Asset Advisory Services, LLC must have earned a college degree and/or have substantive investment-related experience or a related professional designation, such as a Certified Financial Planner™ practitioner. In addition, all such individuals shall have attained all required investment-related licenses and/or designations.

Other Financial Industry Activities or Affiliations

Certain investment advisory representatives of Capital Asset Advisory Services, LLC are registered representative of Royal Alliance Associates, Inc., an FINRA registered broker-dealer. In their separate roles as registered representatives, they may offer to sell clients securities on a commissionable basis for which they will earn the normal commissions. Additionally, certain investment advisory representatives of Capital Asset Advisory Services, LLC are insurance agents or brokers with various insurance companies for the sale of commissionable insurance products for which they may earn the usual commissions. Finally, please see Item 6 of Schedule F for any additional investment advisers that Messrs. Mazzali, Parker, Casey, Cohen, Redfield and Rhoades may be associated with. Some or all of these individuals may also utilize investment advisory programs offered by Royal Alliance Associates, Inc. through Executive Wealth Management, LLC and/or Wealth Advisory Asset Management LLC.

Additional Compensation

CAAS participates in TD Ameritrade's Institutional customer program and CAAS may require clients to maintain accounts with TD Ameritrade/recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between CAAS's participation in the program and the investment advice it gives to its clients, although CAAS receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services provided without cost or at a discount: duplicate client statements and confirmations; research related products and tools; consulting services ; access to a trading desk serving advisor participants; access to block trading which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts; the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain Institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to CAAS by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by CAAS's related persons and may also pay or reimburse expenses including travel, lodging, meals and entertainment expenses for CAAS's personnel to attend conferences or meetings relating to the program or to TD Ameritrade's advisor custody and brokerage services generally. Some of the products and services made available by TD Ameritrade through the program may benefit CAAS but may not benefit its client accounts. These products or services may assist CAAS in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help CAAS manage and further develop its business enterprise. The benefits received by CAAS or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by CAAS or its related persons in and of itself creates a potential conflict of interest and may indirectly influence CAAS's choice/recommendation of TD Ameritrade for custody and brokerage services.

CAAS also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment advisors participating in the program. Specifically, the Additional Services include payment of \$2,500 annually for Morningstar Advisor Workstation and \$7,500 annually for Back Office Support Services (Boss). TD Ameritrade provides the Additional Services to CAAS in its sole discretion and at its own expense, and CAAS does not pay any fees to TD Ameritrade for the Additional Services. CAAS and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

CAAS's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to CAAS, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, CAAS's client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with CAAS, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, CAAS may have an incentive to recommend to its clients that the assets under management by CAAS be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. CAAS's receipt of Additional Services does not diminish its duty to act in the best interests of its clients, including to seek best execution of trades for client accounts.

It should be noted that some of the aforementioned Additional Services may be utilized by Executive Wealth Management, another registered investment adviser, which shares some of the same management as CAAS.