

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

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Name of Investment Adviser: Arford & Associates Comprehensive Wealth Management, Inc.						
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:
	4100 194th St SW, Suite 205	Lynnwood WA		98036		425-778-6160

**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: **Arford & Associates**
Comprehensive Wealth
Management, Inc.

SEC File Number:
801- **69045**

Date:
03/16/2009

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 | <u>86.4</u> % |
| <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... | <u>13.5</u> % |
| <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... | <u>0.1</u> % |
| <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.)

- B. Does applicant call any of the services it checked above financial planning or some similar term? Yes ☒ No ☐

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 checked="" type="checkbox"/> (2) Hourly charges | <input checked="" type="checkbox"/> (5) Commissions |
| <input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input 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 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 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)

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Applicant: **Arford & Associates**
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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 type="checkbox"/> (3) Foreign issuers | <input checked="" type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> B. Warrants | <input type="checkbox"/> J. Futures contracts on: |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| <input type="checkbox"/> D. Commercial paper | <input 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 checked="" type="checkbox"/> (1) real estate |
| <input type="checkbox"/> G. Investment company securities: | <input checked="" 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 checked="" 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 checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | Securities and Exchange Commission |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (7) <input type="checkbox"/> Company press releases |
| | (8) <input checked="" 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
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options,
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 type="checkbox"/> Short sales | |

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

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Part II - Page 4

Applicant: **Arford & Associates
Comprehensive Wealth
Management, Inc.**

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801- 69045

Date:
03/16/2009

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 type="checkbox"/> (8) law firm |
| <input checked="" type="checkbox"/> (3) other investment adviser | <input checked="" type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input 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 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.)

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

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Part II - Page 5

Applicant: Arford & Associates
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Date:
03/16/2009

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.

See Item 11 (A) (B), Schedule F

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

See Item 11 (A) (B), Schedule F

FORM ADV
Part II - Page 6

Applicant: **Arford & Associates
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801-69045

Date:
03/16/2009

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 type="checkbox"/> | <input checked="" type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 type="checkbox"/> | <input checked="" 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
<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Arford & Associates
Comprehensive Wealth
Management, Inc.

SEC File Number:
801- 69045

Date:
03/16/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Arford & Associates Comprehensive Wealth Mgmt. Inc.		IRS Empl. Ident. No.: 91-2157665						
Item of Form (identify)	Answer							
Item 1	<p>Arford & Associates Comprehensive Wealth Management, Inc., doing business as Comprehensive Wealth Management, LLC ("CWM" or "Adviser"), provides investment advice in several ways including financial planning, portfolio management and an asset allocation system known as the Comprehensive Wealth Management Program ("CWM Program"). Portfolio management services are offered through accounts held at Charles Schwab & Co. Inc.'s ("Schwab") Institutional platform. Client fees are payable quarterly, in advance, based on the value of assets under management as of the last day of the preceding calendar quarter using the following fee schedule. For any partial calendar quarter, the management fee of CWM will be pro rated based on the number of calendar days that the Account was open during the quarter. In the event that an account is terminated fees that were collected but yet unearned will be returned on a prorated basis.</p> <p>Clients may terminate any investment advisory service provided by CWM at any time by notifying CWM in writing.</p> <p>Fee Schedule</p> <table border="0"> <tr> <td>Annual Fee Percentage</td> <td>Assets Under Management</td> </tr> <tr> <td>2.00% of first</td> <td>\$500,000</td> </tr> <tr> <td>1.00% for amounts over</td> <td>\$500,000</td> </tr> </table> <p>This is the general fee schedule. Clients should refer to the investment advisory agreement entered into with CWM for the investment advisory fees applicable to their accounts. CWM reserves the right in its sole discretion to negotiate its fee. Fees charged by third party managers are generally not negotiable.</p> <p>Schwab Platform Client pays for all transaction costs.</p> <p>CWM may choose to use the services of third party managers, or other investment advisors, to manage a portion or all of the client's assets. In the case of assets managed by Third Party Managers, CWM does not actively manage client investment accounts on a day-to-day basis, but rather one or more third party investment advisers including affiliated and unaffiliated investment advisers whose programs and investment strategies have been reviewed by CWM. CWM determines which programs and strategies are most appropriate for each of CWM's clients, based upon the client's individual circumstances and needs and investment objectives. Certain of the investment programs offered may also be "wrap fee programs," which are programs under which a client is charged a specified fee, not based directly upon transactions in a client's account, for both investment advisory services and execution of client transactions. All third party investment advisers to whom CWM will refer clients will be licensed as investment advisers by either the state of their primary operations or registered investment advisers with the Securities and Exchange Commission.</p> <p>Discretionary Manager Oversight Services In most situations clients grant CWM the power to choose individual securities or third party investment advisors and account custodians on their behalf. This power is granted with a limited power of</p>		Annual Fee Percentage	Assets Under Management	2.00% of first	\$500,000	1.00% for amounts over	\$500,000
Annual Fee Percentage	Assets Under Management							
2.00% of first	\$500,000							
1.00% for amounts over	\$500,000							

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

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Arford & Associates
Comprehensive Wealth
Management, Inc.

SEC File Number:

801- 69045

Date:

03/16/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Arford & Associates Comprehensive Wealth Mgmt. Inc.		IRS Empl. Ident. No.: 91-2157665
Item of Form (identify)	Answer	
Item 1 cont.	<p>attorney with no restrictions placed upon CWM. The client may place reasonable restrictions with regard to specific types of securities in the account by advising CWM in writing. Client's assets may be reallocated among securities or to another third party investment adviser at any time when in CWM's opinion it is in the client's best interest.</p> <p>CWM Program The CWM Program is a service offered by CWM to some clients. The CWM Program is a wrap program where CWM pays that cost of normal securities transaction charges. Potential investors must refer to the Schedule H disclosure for special risks and potential conflicts of the CWM Program.</p> <p>Financial Planning Some clients are provided a written plan that may include a personal balance sheet and certain projections. Financial plans may in some cases include advice on matters not including securities. 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. CWM 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>CWM's 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. CWM may counsel you as to the consistency of your assumptions with relevant historical data, but CWM will not express any assurance as to the accuracy or reasonableness of your specific data and assumptions. You are 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 nor do they provide any guaranty about future events including an individual's investment returns. The implementation of the plan is solely your responsibility.</p> <p>Financial Planning Fees CWM will charge a fee for preparing a financial plan for a client. The fee may range from \$1,500 to \$3,500. The financial planning engagement is concluded upon delivery of the completed plan to the client. Unless an investment advisory relationship is established through the execution of a written investment advisory agreement with CWM, no supervision, oversight or asset management services will be performed. CWM reserves the right at its sole discretion to discount or waive its standard financial planning fee for its clients with greater than \$250,000 under management with CWM.</p> <p>Hourly Fees CWM will perform services for clients where the cost of the service is based upon the amount of time</p>	

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

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Arford & Associates
Comprehensive Wealth
Management, Inc.

SEC File Number:
801- 69045

Date:
03/16/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Arford & Associates Comprehensive Wealth Mgmt. Inc.

IRS Empl. Ident. No.:

91-2157665

Item of Form (identify)	Answer
Item 1 cont.	<p>to complete the service at an hourly rate. The rate per hour would depend upon the level of complexity of the service and personnel used in the engagement. This negotiable rate would normally not exceed \$225 per hour. The tasks and services to be performed would be described in an engagement letter that is signed by the client and CWM that describes the hourly rate, an estimate of time to complete the project and the procedure for refund or partial billing if the engagement is terminated before completion.</p> <p>In addition to hourly fees charged for financial planning services, clients are responsible for the cost of implementation of investment advice provided by CWM. The client may but is not required to implement financial planning advice through CWM or one of its representatives. These implementation costs include but are not limited to asset management fees paid to CWM, Third Party Money Managers, Custodians, and broker-dealers and insurance commissions. These fees are disclosed in the disclosure document or agreements with the Third Party Money Managers and/or account opening documents. Similar services are available in the financial services marketplace for similar (higher or lower) costs.</p> <p>In circumstances where the client chooses to invest in a variable annuity product, hold the investment with the insurance company as the custodian and hire CWM or a third party adviser to allocate the sub-accounts, CWM will include the value of the assets in the annuity as an asset under management for billing purposes and a investment adviser representative of CWM in their capacity as a registered representative of a broker-dealer could receive a commission and or a trailing commission on the variable annuity investment. The potential of this financial incentive could create a possible conflict of interest between the client and CWM.</p> <p>The above-referenced fees charged by the Adviser 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 client of the Adviser. Some mutual fund companies have impose 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 mutual funds will use the "first-in, first-out" 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 the Adviser to sell client's securities in a period that would generate a redemption fee, it should be anticipated that the Adviser might do so if in its opinion the sale is in the clients best</p>

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

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Arford & Associates
Comprehensive Wealth
Management, Inc.

SEC File Number:
801- 69045

Date:
03/16/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Arford & Associates Comprehensive Wealth Mgmt. Inc.		IRS Empl. Ident. No.: 91-2157665
Item of Form (identify)	Answer	
Item 1 Cont.	<p>interests.</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>	
Item 3	<p>Types of Investments CWM may introduce clients to investment managers, or act as the manager depending on the portfolio, who provide discretionary management of individual portfolios of equity and/or fixed income securities. You should refer to the ADV Part II of any other investment manager to determine the types of investments they may use.</p> <p>In some cases upon special request and agreement, CWM will provide investment advisory services involving option contracts on securities and futures. These services are not provided to all clients.</p>	
Item 4	<p>Methods of Analysis, Sources of Information and Investment Strategies In advising clients CWM normally uses model portfolios of mutual funds, exchange traded funds (ETF's) and variable annuity sub-accounts. CWM constructs and adjusts the model portfolios by referencing in part research provided by a number of institutional investment strategists information, research, asset allocation methodology and investment strategy of others.</p> <p>Equity Management Program CWM may from time-to-time recommend that investment advisory clients borrow money secured by their home or other real estate. Clients are hereby notified of and the client acknowledges the inherent risks, increased costs and expenses posed by this practice and the potential conflicts of interest CWM has in giving this advice.</p> <p>RISKS. Borrowing money to invest in securities is a speculative act and in the event that the borrower cannot repay the borrowed funds, the client could lose their home through a foreclosure action. Further, the value of securities purchased with borrowed funds may fluctuate below the loan payoff amount and require additional funds to repay the loan.</p> <p>COSTS. Clients should weigh the potential gains against the costs and expenses involved in borrowing money which includes loan fees, closing costs and title and/or mortgage insurance and interest that the client will be required to pay to the lender of the funds. It is possible that these costs and expenses will be greater than any appreciation in the client's investment portfolio.</p> <p>POTENTIAL CONFLICT OF INTEREST. CWM has a financial incentive to recommend that clients borrow money and place those funds under management with CWM. This financial incentive creates a potential conflict of interest between the client and CWM.</p> <p>Potential Effect of Adviser Paying Transaction Costs Because in the CWM Program the Adviser pays for the costs of securities transactions and has the full discretionary power to decide if and when a securities transaction is made, the Adviser has the financial incentive not to make securities transactions. Paying for securities transactions in the client's</p>	

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

**Schedule F of
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Arford & Associates Comprehensive Wealth Mgmt. Inc.

IRS Empl. Ident. No.:

91-2157665

Item of Form (identify)	Answer
Item 5	investment portfolio creates a potential conflict of interest where CWM has the financial incentive not to make a securities transaction in the clients account when it is in the client's best interest to do so. Education and Buisness Standards Persons giving advice to clients on behalf of CWM must either be a Registered Investment Advisor, an Investment Adviser Representative, or a Certified Financial Planner designee.
Item 6	Education and Business Background Gary M. Arford Born 1955 Attended U.S. Air Force Academy Graduated from Concordia College CFP, CFA & CCIM Designations Life & Disability Insurance Licenses Employment: CWM 06/2001 to Present Geneos Wealth Management 08/2003 to 12/2005 Commonwealth Financial Network 10/2000 to 07/2003 Brian J. Lockett Born 1978 Graduated from Washington State University Series 7 & 66 Licenses Life & Disability Insurance Licenses Employment: CWM 01/2001 to Present Geneos Wealth Management 02/2004 to Present Commonwealth Financial Network 09/2002 to 07/2003 Morgan L. Arford Born 1983 No Post-Secondary Formal Education Series 65 License Employment: CWM 06/2004 to Present Student 01/2004 to 06/2004
Item 7 (A) (B) (C)	Other Business Activities Activities Other Than Providing Investment Advice CWM provides full financial planning services and professional management of employer sponsored retirement plans (i.e. 401k's and 403b's) in addition to its regular investment advisory services. Products and Services Other Than Investment Advice

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SEC File Number:

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03/16/2009

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Item 7 (A) (B) (C) cont.	Owners and Investment Advisor Representatives of CWM may also be Registered Representatives of a FINRA registered broker-dealer and licensed insurance agents. In their capacity as a registered representative and/or insurance agent they may recommend and execute securities transactions or sell insurance products to clients of CWM. These individuals will receive commission compensation for acting as a registered representative and/or insurance agent.	
Item 8 (C) (1)	<p>Other Financial Industry Activities or Affiliations</p> <p>The associated persons of CWM may also be registered representatives of Geneos Wealth Management, Inc. ("Geneos"). Geneos is a FINRA registered broker-dealer, a registered investment advisor, and is also licensed as a broker-dealer with the states in which Geneos and its representatives offer securities to clients. Brian J. Lockett is an associated person, holds a Series 7 securities license and acts as a registered representative of Geneos. Brian may act as the advisory client's registered representative in the execution of securities transactions on a normal and customary basis for accounts held at Geneos. Brian will receive compensation in the form of a sales commission for securities transactions where he acts as the registered representative of Geneos. The financial incentive to recommend a securities transaction creates a potential conflict of interest between the client and Brian where his interests may not be aligned with those of the client. Brian may also act as an investment advisor representative for these same clients for advisory accounts held at Schwab.</p> <p>Client pays for all transaction costs except for the CWM Program where CWM pays for the transaction costs.</p>	
Item 8 (C) (3)	CWM is a registered investment adviser registered with the Securities and Exchange Commission. CWM may offer the services of various third-party investment advisers. Clients shall receive the third-party adviser's Form ADV Part II.	
Item 8 (C) (9)	Some associated persons of CWM are licensed life and disability insurance agents with all the appropriate state Department of Insurance licenses, and may receive customary commissions on insurance products sold. In such instances, there is no advisory fee associated with these insurance products. Because of the financial incentive to recommend insurance products where a commission will be earned, a potential conflict of interest exists between the client and CWM with regard to these products.	
Item 9 (B)	<p>Participation or Interest in Client Transactions</p> <p>CWM's investment adviser representatives may from time-to-time effect securities transactions acting as a registered representative of Geneos. As discussed above, the registered representative will receive a compensation in the form of a sales commission.</p>	
Item 9 (E)	<p>Participation or Interest in Client Transactions</p> <p>The associated persons and/or employees of CWM may from time-to-time buy or sell for their own personal accounts, securities which have also been recommended to the client. As a practice, the associated person or employee transactions, if any, are executed after related client transactions have been executed, or as part of a block trade in which all accounts of like holdings are traded together</p>	

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Item 9 (E) cont.	and receive the same average price. CWM has procedures dealing with insider trading, employee related accounts, "front-running" and other issues that may present a potential conflict when such purchase, sale or recommendations are made. In general, these policies and procedures are intended to eliminate, to the extent possible, the adverse effect on clients of any such potential conflicts of interest.	
Item 10	<p>Conditions for Managing Accounts</p> <p>Although the adviser does not require a minimum investment amount in connection with rendering fina Program. Third party investment advisers may also have minimum account sizes.</p>	
Item 11 (A) (B)	<p>Review of Accounts</p> <p>Advisory clients, and financial planning clients who maintain investment accounts with CWM, accounts are reviewed when requested and during annual/semi-annual/quarterly/ monthly client meetings. CWM's model portfolios are monitored throughout the day on a daily basis during normal market hours whenever the market is open. The reviewer can be any investment adviser representative of CWM. Currently, the reviewers include Gary M. Arford, President, and Brian J. Lockett, Financial Advisor.</p> <p>Financial plans are prepared for clients who have retained CWM for this purpose. Upon completion of the plan, a CWM investment adviser representative meets with the client to review the plan and answer any questions the client may have about the contents of the plan. The financial planning client is under no obligation to implement their plan as an advisory client of CWM. Financial plans may be reviewed annually if the client chooses to do so. Additional fees may be charged for such review if the client does not maintain accounts with CWM under a management fee agreement and if their investments under management are less than \$250,000.</p> <p>Financial planning clients receive no reports other than the plan document. If the financial planning client chooses to implement their financial plan through CWM, they receive the following reports and statements that all advisory clients receive, directly from Schwab:</p> <p>Confirmation of Transactions Monthly/Quarterly Account Statements Proxy Material Notices of Changes to Terms and Conditions of the Account Notices of Changes to Account Details Prospectuses Year-End Gain/Loss Statements Report Form 1099 Tax Report</p> <p>CWM also has a website that allows client access to account information through a portal to Schwab's website, and performance reporting from Albridge Solutions, a third-party provider of account information. CWM prepares performance reports from Albridge Solutions or Porfolio Center for client meetings and upon request, and prepares billing statements for management fees charged under advisory agreements.</p>	

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Item 12 (A)	<p>Investment or Brokerage Discretion Clients that enter into discretionary management oversight services grant a limited power of attorney to CWM. Under this limited power of attorney, CWM may purchase, sell or hold any security in the clients account without restriction on the specific security, type of security or amount without prior consultation or approval by the client. Clients may impose reasonable restrictions on the securities purchased, sold or held in their accounts by notifying CWM in writing.</p>	
Item 12 (B)	<p>Suggested Broker-Dealers The criteria for suggesting a broker-dealer include reasonableness of commissions, and other costs of trading, ability to facilitate trades, access to client records, computer trading support, and other operational considerations. These factors will be reviewed from time-to-time to assure the best interests of the client are upheld.</p> <p>While the Adviser normally will recommend a particular custodian or broker-dealer it does not have the discretionary authority to determine the broker-dealer to be used or the commission rates to be paid. Clients must direct the Adviser as to the broker dealer to be used.</p> <p>Directed Brokerage If a client directs the Adviser to execute securities transactions at a broker other than one the Adviser uses for its other clients the client will forgo any benefit from savings on execution costs that the Adviser may have obtained through its negotiation of volume discounts or batched orders. In directing the use of a particular broker or dealer, it should be understood that the Adviser will not have authority to negotiate commissions or obtain volume discounts, and best execution may not be achieved. The client may incur higher commissions, other transactions costs or greater spreads, or receive less favorable net prices, or transaction for his or her account than would otherwise be the case had the client determined to effect transactions through alternative brokerage relationships generally available through the Adviser.</p>	
Item 13 (A)	<p>Additional Compensation CWM may recommend that clients establish brokerage accounts with a particular account custodian (Custodian) who is a registered broker-dealer to maintain custody of clients assets and to effect trades in their accounts. CWM is independently owned and operated and not affiliated with Custodian. Custodian provides CWM with access to its institutional trading and custody services, which are typically not available to Custodian's retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a minimum amount of the adviser's clients assets is maintained in accounts at Custodian, and are not otherwise contingent upon Adviser committing to Custodian any specific amount of business (assets in custody or trading). Custodian's services include brokerage, 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.</p> <p>For CWM client accounts maintained in its custody, the Custodian generally does not charge separately for custody but is compensated by account holders through commissions or other</p>	

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Item 13 (A) cont.	<p>transaction-related fees for securities trades that are executed through Custodian or that settle into Custodian accounts.</p> <p>Custodian also makes available to CWM other products and services that benefit CWM but may not benefit its clients accounts. Some of these other products and services assist CWM 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 execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of CWM's fees from its clients accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all of a substantial number of CWM's accounts, including accounts not maintained at Custodian. Custodian also makes available to CWM other services intended to help CWM manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Custodian may make available, arrange and/or pay for these types of services rendered to CWM by independent third parties. Custodian 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 CWM. While as a fiduciary, CWM endeavors to act in its clients best interests, and CWM's recommendations that clients maintain their assets in accounts at Custodian may be based in part on the benefit to CWM of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Custodian, which may create a potential conflict of interest.</p> <p>END OF SCHEDULE F</p>	

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