

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

OMB Number: 3235-0049
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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 | 86.4 | % |
| <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... | 13.5 | % |
| <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... | 0.1 | % |
| <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
<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 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
Comprehensive Wealth
Management, Inc.**

SEC File Number:
801- 69045

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03/16/2009

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.

SEC File Number:
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
- formal education after high school
- year of birth
- 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)

Applicant: Arford & Associates
Comprehensive Wealth
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SEC File Number:
801-69045

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

Applicant: Arford & Associates
Comprehensive Wealth
Management Inc.

SEC File Number:
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

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? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| B. directly or indirectly compensates any person for client referrals? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

(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 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:
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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.	interests.	
Item 3	<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>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

(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 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	Conditions for Managing Accounts 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.	
Item 11 (A) (B)	<p>Review of Accounts 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>	

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

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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>	

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

Applicant: Arford & Associates Comprehensive
Wealth Management, Inc.

SEC File Number:
801-69045

Date:
03/16/2009

(for sponsors of wrap fee programs)

Name of wrap fee program or programs described in attached brochure:

CWM Program

1. **Applicability of Schedule.** This Schedule must be completed by applicants that are compensated under a wrap fee program for sponsoring, organizing, or administering the program, or for selecting, or providing advice to clients regarding the selection of, other investment advisers in the program ("sponsors"). A wrap fee program is any program under which a specified fee or fees not based directly upon transactions in a client's account is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and execution of client transactions.
2. **Use of Schedule.** This Schedule sets forth the information the sponsor must include in the wrap fee brochure it is required to deliver or offer to deliver to clients and prospective clients of its wrap fee programs under Rule 204-3 under the federal Advisers Act and similar rules of jurisdictions. The wrap fee brochure prepared in response to this Schedule must be filed with the Commission and the jurisdictions as part of Form ADV by completing the identifying information on this Schedule and attaching the brochure. Brochures should be prepared separately, not on copies of this Schedule. Any wrap fee brochure filed with the Commission as part of an amendment to Form ADV shall contain in the upper right corner of the cover page the sponsors' registration number (801-).
3. **General Contents of Brochure.** Unlike Parts I and II of this form, this Schedule is not organized in "check-the-box" format. These instructions, including the requests for information in Item 7 below, should not be repeated in the brochure. Rather, this Schedule describes minimum disclosures that must be made in the brochure to satisfy the sponsor's duty to disclose all material facts about the sponsor and its wrap fee programs. **Nothing in this Schedule relieves the sponsor from any obligation under any provision of the federal Advisers Act or rules thereunder, or other federal or state law to disclose information to its advisory clients or prospective advisory clients not specifically required by this Schedule.**
4. **Multiple Sponsors.** If two or more persons fall within the definition of "sponsor" in Item 1 above for a single wrap fee program, only one such sponsor need complete the Schedule. The sponsors may choose among themselves the sponsor that will complete the Schedule.
5. **Omission of Inapplicable Information.** Any information not specifically required by this Schedule that is included in the brochure should be applicable to clients and prospective clients of the sponsor's wrap fee programs. If the sponsor is required to complete this Schedule with respect to more than one wrap fee program, the sponsor may omit from the brochure furnished to clients and prospective clients of any wrap fee program or programs information required by this Schedule that is not applicable to clients or prospective clients of that wrap fee program or programs. If a sponsor of more than one wrap fee program prepares separate wrap fee brochures for clients of different programs, each brochure must be filed with the Commission and the jurisdictions attached to a separate copy of this Schedule. Each such brochure must state that the sponsor sponsors other wrap fee programs and state how brochures for those programs may be obtained.
6. **Updating.** Sponsors are required to file an amendment to the brochure promptly after any information in the brochure becomes materially inaccurate. Amendments may be made by use of a "sticker", i.e., a supplement affixed to the brochure that indicates what information is being added or updated and states the new or revised information, as long as the resulting brochure is readable. Stickers should be dated and should be incorporated into the text of the brochure when the brochure itself is revised.
7. **Contents of Brochure.** Include in the brochure prepared in response to this Schedule:
 - (a) on the cover page, the sponsor's name, address, telephone number, and the following legend in bold type or some other prominent fashion:
This brochure provides clients with information about [name of sponsor] and the [name of program or programs] that should be considered before becoming a client of the [name of program or programs]. This information has not been approved or verified by any governmental authority.
 - (b) a table of contents reflecting the subject headings in the sponsor's brochure.
 - (c) the amount of the wrap fee charged for each program or, if fees vary according to a schedule established by the sponsor, a table setting forth the fee schedule, whether such fees are negotiable, the portion of the total fee (or the range of such amounts) paid to persons providing advice to clients regarding the purchase or sale of specific securities under the program ("portfolio managers"), and the services provided under each program (including the types of portfolio management services);

**Schedule H of
FORM ADV
Page 2**

Applicant: Arford & Associates Comprehensive
Wealth Management, Inc.

SEC File Number:
801-69045

Date:
03/16/2009

- (d) a statement that the program may cost the client more or less than purchasing such services separately and a statement of the factors that bear upon the relative cost of the program (e.g., the cost of the services if provided separately and the trading activity in the client's account);
- (e) if applicable, a statement that the person recommending the program to the client receives compensation as a result of the client's participation in the program, that the amount of this compensation may be more than what the person would receive if the client participated in other programs of the sponsor or paid separately for investment advice, brokerage, and other services, and that the person may therefore have a financial incentive to recommend the wrap fee program over other programs or services;
- (f) a description of the nature of any fees that the client may pay in addition to the wrap fee and the circumstances under which these fees may be paid (including, if applicable, mutual fund expenses and mark-ups, mark-downs, or spreads paid to market makers from whom securities were obtained by the wrap fee broker);
- (g) how the program's portfolio managers are selected and reviewed, the basis upon which portfolio managers are recommended or chosen for particular clients, and the circumstances under which the sponsor will replace or recommend the replacement of the portfolio manager;
- (h) (1) if applicable, a statement to the effect that portfolio manager performance information is not reviewed by the sponsor or a third party and/or that performance information is not calculated on a uniform and consistent basis,
- (2) if performance information is reviewed to determine its accuracy, the name of the party who reviews the information and a brief description of the nature of the review,
- (3) a reference to any standards (i.e., industry standards or standards used solely by the sponsor) under which performance information may be calculated;
- (i) a description of the information about the client that is communicated by the sponsor to the client's portfolio manager, and how often or under what circumstances the sponsor provides updated information about the client to the portfolio manager;
- (j) any restrictions on the ability of clients to contact and consult with portfolio managers;
- (k) in narrative text, the information required by Items 7 and 8 of Part II of this form and, as applicable to clients of the wrap fee program, the information required by Items 2, 5, 6, 9A and C, 10, 11, 13 and 14 of Part II;
- (l) if any practice or relationship disclosed in response to Item 7, 8, 9A, 9C and 13 of Part II presents a conflict between the interests of the sponsor and those of its clients, explain the nature of any such conflict of interest; and
- (m) if the sponsor or its divisions or employees covered under the same investment adviser registration as the sponsor act as portfolio managers for a wrap fee program described in the brochure, a brief, general description of the investments and investment strategies utilized by those portfolio managers.

8. Organization and Cross References. Except for the cover page requirements in Item 7(a) above, information contained in the brochure need not follow the order of the items listed in Item 7. However, the brochure should not be organized in such a manner that important information called by the form is obscured.

Set forth below the page(s) of the brochure on which the various disclosures required by Item 7 are provided.

Page(s)		Page(s)		Page(s)	
Item	7(a)	cover	Item	7(f)	5
	#7(b)	2		#7(g)	7
	#7(c)	4		#7(h)	N/A
	#7(d)	5		#7(i)	1
	#7(e)	6			
			Item	7(j)	1
				#7(k)	7
				#7(l)	5
				#7(m)	1

SEC File Number 801-69045
CRD Number 116958

CWM Program

Schedule H

Arford & Associates Comprehensive Wealth Management, Inc.
doing business as Comprehensive Wealth Management, LLC
4100 194th Street SW, Suite 205
Lynnwood WA 98036
425-778-6160
800-268-2440

Updated March 18, 2009

This brochure provides clients and potential clients with information about Arford & Associates Comprehensive Wealth Management, Inc. doing business as Comprehensive Wealth Management, LLC and the CWM Program that should be considered before becoming a client in the CWM Program. This information has not been approved or verified by any governmental authority.

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Introduction

This brochure describes the following managed account program provided by Arford & Associates Comprehensive Wealth Management, Inc. ("Comprehensive Wealth Management") for you as a client of Comprehensive Wealth Management in the CWM Program ("CWM Program"). Comprehensive Wealth Management is the money manager in the program and manages your investment portfolio on a discretionary basis.

FEES Clients pay a single asset-based fee to participate in the program. The fee covers services provided by Comprehensive Wealth Management, including, execution of transactions in securities by Charles Schwab & Company, Inc. ("Schwab"), and the discretionary asset management services provided by Comprehensive Wealth Management. The fee does not cover trades executed by broker-dealers other than Schwab. Minimum account sizes apply to the program and generally start at \$150,000.

The CWM Program is sponsored by Comprehensive Wealth Management. In the CWM Program, Schwab only provides custody, execution, reporting, program administration and related services for accounts under the program. Schwab is independent of and not affiliated with Comprehensive Wealth Management. Schwab is not a sponsor of the CWM Program.

Change in Client Circumstances

If material changes occur to your financial circumstances or investment objectives or you wish to impose or modify restrictions on the management of your account, it is your responsibility to promptly inform Comprehensive Wealth Management. A representative of Comprehensive Wealth Management will respond to your questions and periodically discuss with you whether the management of your account continues to reflect your investment objectives and financial requirements. You may contact a representative of Comprehensive Wealth Management at any time without restriction during normal business hours.

Asset Management Services

Comprehensive Wealth Management is the only money manager in the CWM Program and will provide discretionary investment advisory services and is responsible for all investment decisions in your account. You authorize Comprehensive Wealth Management to manage your assets on a discretionary basis by purchasing and/or selling individual stocks, fixed income securities, mutual funds, exchange-traded funds, money market instruments, money market funds, or other instruments as and when Comprehensive Wealth Management sees fit without your prior approval of each transaction. In managing your account, Comprehensive Wealth Management will employ various investment strategies as described in Comprehensive Wealth Management's brochure, Form ADV, Part II, and any other material Comprehensive Wealth Management may give to you. The client grants Comprehensive Wealth Management discretionary authority in the investment advisory agreement that the client enters into with Comprehensive Wealth Management and it will remain in full force and effect, even if you become incompetent or disabled, unless revoked or terminated by you. Comprehensive Wealth Management will collect information about your investment objectives. You will have the opportunity to impose reasonable restrictions on the management of your account. You may request that specific securities or categories of securities not be purchased for your account. Comprehensive Wealth Management is responsible for implementing and monitoring any restrictions you place on the management of your account.

Investments and Investment Strategies

All clients will be put into tactically allocated models which are invested primarily on the basis of fundamental analysis and/or momentum-based strategies which may over-weight or under-weight certain asset classes within these models based upon current market conditions.

Comprehensive Wealth Management utilizes four basic portfolio models to invest client assets:

Capital Preservation Allocation Model

The objective of the Capital Preservation Allocation model is to maintain the current account value with limited growth and risk. The model will normally invest 45-60% of its assets in fixed income securities with the remainder in equity securities. All investments will be diversified over a variety of asset classes. Volatile market conditions may result in the majority, or all, of the portfolio being held in cash equivalent securities and/or fixed income securities.

Balanced Income Allocation Model

The objective of the Balanced Income Allocation model is to obtain some capital appreciation while limiting the amount of risk exposure. The model will normally invest 30-40% of its assets in fixed income securities with the remainder in equity securities. All investments will be diversified over a variety of asset classes. Volatile market conditions may result in the majority, or all, of the portfolio being held in cash equivalent securities and/or fixed income securities.

Growth Allocation Model

The objective of the Growth Allocation model is to obtain capital appreciation while carefully managing risk. The model will normally invest 15-20% of its assets in fixed income securities with the remainder in equity securities. All investments will be diversified over a variety of asset classes. Volatile market conditions may result in the majority, or all, of the portfolio being held in cash equivalent securities and/or fixed income securities.

Aggressive Growth Allocation Model

The objective of the Aggressive Growth Allocation model is active pursuit of investments that will increase the value of the portfolio with less risk management than other models. The model will normally invest 2% of its assets in cash equivalent securities with the remainder in equity securities. All investments will be diversified over a variety of asset classes. Volatile market conditions may result in the majority, or all, of the portfolio being held in cash equivalent securities and/or fixed income securities.

Small Accounts Allocation

Due to trading costs and the effect they have on smaller accounts, every account under \$100,000 will be put into a model noted above which will restrict the investments in cash equivalent securities, fixed income securities and equity securities to no-cost mutual funds offered on the Schwab platform. The Small Accounts Allocation models will follow the investment allocation noted above for its corresponding risk level, and all investments will be diversified over a variety of asset classes. As with the models noted above, volatile market conditions may result in the majority, or all, of the portfolio being held in cash equivalent securities and/or fixed income securities.

Schwab Execution Services

The program fee covers only execution of equity orders by Schwab, as well as execution of fixed income orders by Schwab on an agency basis, but the program fee does not include execution of orders by Schwab as principal in fixed income securities. Please note that Comprehensive Wealth Management will not purchase through Schwab fixed income securities for any account in the CWM Program on a principal basis.

Execution of Transactions in Equity Securities

Because the program fee covers execution of orders in equity securities only when executed through Schwab, Comprehensive Wealth Management places most of their orders for the purchase or sale of equity securities with Schwab. Certain orders given to Schwab may be routed to UBS Financial Services. UBS routing and execution services are subject to Schwab's execution quality standards for achieving best execution. In certain circumstances, Schwab itself, acting as broker-dealer, may route orders directed to a market for execution.

Execution of Transactions in Fixed Income Securities

Fixed income securities generally trade in dealer markets, but some corporate bonds also trade on national securities exchanges. As noted above, if Comprehensive Wealth Management purchases a fixed income security for any account in the CWM Program, Comprehensive Wealth Management will direct Schwab to execute the order as agent, and not as principal, on the transaction. In seeking best execution based upon net price and other factors that Comprehensive Wealth Management may consider, Comprehensive Wealth Management is able to place orders for fixed income securities with dealers other than Schwab. Should Comprehensive Wealth Management place fixed income orders with dealers other than Schwab, Comprehensive Wealth Management will direct the dealer to execute the order as agent, and not as principal, on the transaction. Although these purchase and sale transactions would be executed on an agency basis with no commission payable to Comprehensive Wealth Management, the dealer may have built into its price a mark-up or mark-down, which is not included in the program fees.

Additional Charges for Trades Through Other Broker-Dealers

The program fee does not cover commissions for trades that Comprehensive Wealth Management places with a broker-dealer other than Schwab, or mark-ups or mark-downs charged by those other broker-dealers. Comprehensive Wealth Management will have an incentive to execute most transactions in equity securities through Schwab. This incentive could, in some circumstances, conflict with Comprehensive Wealth Management's duty to obtain best execution of transactions in your account. However, Comprehensive Wealth Management may execute trades through other broker-dealers when required by applicable law or when Comprehensive Wealth Management reasonably believes that another broker-dealer will provide better execution, net of any additional resulting transaction charges, than would be the case if the transaction were executed through Schwab. Such other broker-dealers may provide Comprehensive Wealth Management with brokerage and research services, as disclosed in Comprehensive Wealth Management's Form ADV, Part II.

Aggregation of Transactions

Comprehensive Wealth Management may aggregate or bunch transactions for your account with the transactions for other clients for execution purposes under appropriate circumstances. For these purposes, other clients may include other clients of Comprehensive Wealth Management not in the CWM Program. The transactions (as well as any expenses incurred in transactions effected through other broker-dealers) will be allocated according to Comprehensive Wealth Management's policies governing aggregation and allocation of transactions. These policies may require Comprehensive Wealth Management to assign to your account the average price resulting from the aggregated trades. Partial fills of a block security transaction may be allocated by Comprehensive Wealth Management among clients' accounts. Partially filled buy orders are allocated on a pro rata basis based upon the original allocation. De Minimis trades may be excluded. The order of individually placed trades is determined by the percentage of uninvested cash or cash equivalent securities relative to other accounts, where the largest percentage of uninvested cash and/or cash equivalent securities goes first. Comprehensive Wealth Management's trade allocation policies may result in certain clients paying higher or lower prices for securities than may otherwise have been obtained if the transaction had been executed separately.

Custody

Schwab acts as custodian for all assets in client accounts and performs all custodial functions customarily performed for securities brokerage accounts, including but not limited to crediting of interest and dividends on account assets. You will retain ownership of all cash, securities, and other instruments in your account. The program fee compensates Comprehensive Wealth Management and they in turn compensate Schwab for these services. If you have accounts with assets at Schwab that are not in the program, any fees you are charged for the maintenance of such accounts, for custody of assets and for other account related services, will be separate from and in addition to your program fees.

Reporting

Schwab will send you an account statement, not less frequently than quarterly, detailing positions and activity in your account during the preceding statement reporting period. The statement will include a summary of all transactions made on your behalf, all contributions and withdrawals made to or from your account, all fees and expenses charged to your account, and the reported value of your account at the beginning and end of the period. The statement may be based upon information obtained from third parties. You also will receive a separate trade confirmation for each transaction, unless you elect to receive a quarterly report containing confirmation information for trades occurring during the calendar quarter. By signing the Schwab Institutional account application, you authorize Schwab to provide trading and other information about your account to Comprehensive Wealth Management.

Performance information distributed by Schwab may be provided by a third party. Comprehensive Wealth Management believes that the data obtained from the third party is accurate, but does not independently verify and is not responsible for its accuracy.

Fees

Comprehensive Wealth Management charges an asset-based fee for the services provided under the CWM Program by Comprehensive Wealth Management. The maximum fee charged for the program is set forth in the table below. The fees are negotiable based on a number of factors that may result in a client paying a fee greater or less than the standard fees. The exact fee you will pay is specified in your Comprehensive Wealth Management advisory agreement.

Dollar Value of Assets in the CWM Program	Annual Fee
First \$500,000	2%
Amounts over \$500,000	1%

The CWM Program fee is expressed as an annual rate. To calculate your program fee, Comprehensive Wealth Management multiplies the account value on the last day of the previous quarter by the quarterly pro rata portion of the annual rate. The CWM Program fee is billed to your account quarterly, which may result in your paying a higher fee on an annual basis than the annual rate due to the effects of compounding. The CWM Program fee is blended---i.e., as the market value of your program account reaches a higher breakpoint, as set forth above, the assets within the next higher breakpoint are charged a lower rate. Cash flows into or out of the account since the prior quarter billing are accounted for and increase or decrease your fees depending whether funds are incoming (increase) or outgoing (decrease).

If you have more than one account in either or both programs, your accounts may be "household" for purposes of calculating the fee. A "household" is generally a group of accounts having the same address of record or the same Social Security number. The accounts which may be householded are subject to negotiation and Comprehensive Wealth Management's approval. Comprehensive Wealth Management calculates your household fee by totaling your accounts according to the fee schedule. The fee is then allocated on a pro rata basis to each account. Each account's pro rata amount is calculated by computing the market value of each account as a percentage of the total market value of all accounts under the fee schedule.

If the market value of your account falls below a specified minimum due to your withdrawal of assets from the account, Comprehensive Wealth Management may require you to deposit additional money or securities to bring the account up to the required minimum, close the account or change it to another type of account.

Services Covered By The CWM Program Fee

The CWM Program fee covers Comprehensive Wealth Management's asset management services, as well as the following services provided by Schwab: (1) execution of transactions in equity securities, and (2) custody of account assets.

The CWM Program fee covers trade execution for transactions in equity securities executed through Schwab. It does not include (1) execution of transactions in fixed income securities by Schwab as principal and (2) execution of transactions in securities by other broker-dealers.

Other Charges and Compensation

Trades in fixed income securities executed by Schwab as principal and trades executed by other dealers may involve transaction charges in addition to the CWM Program fee. When a broker-dealer executes a trade as principal, the dealer may realize the customary dealer profits or losses on the trade. Schwab may also charge a markup or markdown on transactions executed as principal in fixed income securities in the CWM Program. When a trade is executed by Comprehensive Wealth Management with Schwab or another broker-dealer, you will pay additional compensation to that broker-dealer or Schwab, which may include mark-ups, mark-downs, commissions, and dealer profits. Any dealer profit, commission, markup or markdown on principal trades will be separate from and in addition to, and will not reduce or otherwise offset, the CWM Program fee for your account. The CWM Program fee does not cover certain costs or charges imposed by third parties, including, but not limited to, odd-lot differentials, American Depositary Receipt fees, exchange fees, and transfer taxes mandated by law. Schwab also may impose additional charges for special services elected by you or Comprehensive Wealth Management, including without limitation periodic distribution fees, electronic fund and wire transfer fees, certificate delivery fees, and reorganization fees.

Payment of Program Fees and Other Charges

CWM Program fees are deducted from your account in the month beginning the quarter for which the fees are to be earned. Other charges are deducted from your account when they are incurred. The CWM Program fee and other charges are payable from free credit balances, if any, in your account. If there are no free credit balances in your account, Comprehensive Wealth Management may money market fund shares in your account to cover the charges or notify you to deposit additional funds into your account. Comprehensive Wealth Management reserves the right to liquidate at any time a portion of the other assets in your account to cover the CWM Program fee or other charges. Liquidations may affect the relative balance of your account and also may have tax consequences.

Valuation

For the purposes of calculating the CWM Program fee, Comprehensive Wealth Management will use the value reported to Schwab as the value of a security listed on a national securities exchange, as of the valuation date, at the closing or last sale price on the principal market where the security is traded.

Conflicts of Interest

In addition to the conflicts of interest described in this document, the Form ADV, Part II of Comprehensive Wealth Management contains conflict of interest disclosure information for Comprehensive Wealth Management.

Amount of Fees

The CWM Program fee may be more or less than you would pay if you purchased separately the types of services included in the CWM Program. You may be able to obtain some or all of the types of services available through the CWM Program on a stand-alone basis through Comprehensive Wealth Management or other firms. For example, you could separately purchase execution services from Schwab, and you could choose to either pay a commission for each transaction or pay an asset-based fee that would cover all transactions. Depending upon the circumstances, the total of any separately paid charges may be higher or lower than the CWM Program fee. Factors that bear upon the cost of the CWM Program in relation to the cost of the same services purchased separately include, among other things, the type and size of your account (and other accounts that you may be able to combine to determine fee breakpoints), the historical and expected size or number of trades for your account, and the number and range of supplementary advisory and other services provided to your account. The CWM Program fee may be higher or lower than the fees charged by other firms for comparable services.

Non-Exclusive Relationship

Comprehensive Wealth Management may perform, among other things, asset management, and similar services for other clients and receive asset-based fees for such services. The advice given and the actions taken for a particular client may differ from the advice given or the timing and nature of action take for other clients' accounts.

Transactions in a specific security may not be accomplished for all clients' accounts at the same time or at the same price. In managing your account, Comprehensive Wealth Management may purchase or sell securities in which Comprehensive Wealth Management, or its officers, directors, employees or representatives, directly or indirectly, have or may acquire a position or interest.

Comprehensive Wealth Management or their affiliates may, in the course of business, obtain material non-public or other confidential information that, if disclosed, might affect an investor's decision to buy, sell or hold a security. Comprehensive Wealth Management and their affiliates are restricted from disclosing or using this information under applicable law, and are under no obligation to disclose the information to any client or use it for any clients' benefit.

Investment in Funds

Comprehensive Wealth Management may decide to invest cash in your account in a fund traded on a stock exchange ("ETF") or mutual fund. To the extent assets in your account are invested in an ETF, mutual fund or money market fund, you will in effect be paying for asset management or investment services at two levels-through the fees charged to the ETF, mutual fund or money market fund by the fund manager or sponsor and through the CWM Program fee charged to your account. In this case, Comprehensive Wealth Management will be receiving compensation for managing your assets where some part of the assets are invested in an investment fund with its own management and fee structure. In addition, it is possible that the ETF or mutual fund may hold a position in a security which you have restricted from your account.

Other Compensation

The compensation of the owners of Comprehensive Wealth Management is based on the amount of net assets that clients place into Comprehensive Wealth Management's managed account CWM Program.

Comprehensive Wealth Management may have other business relationships with Schwab, in connection with which Comprehensive Wealth Management or its clients compensates Schwab for services. For example, Comprehensive Wealth Management may receive (on behalf of clients or otherwise) research, execution, custodial, referral, pricing and other services offered by Schwab or an affiliate in the normal course of its financial services business. Schwab does not charge Comprehensive Wealth Management a fee to participate in the CWM Program.

Equity Management Program

Comprehensive Wealth Management 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 Comprehensive Wealth Management has in giving this advice.

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.

COSTS. Clients should weigh the potential gains against the costs and expenses involved in borrowing which include 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.

POTENTIAL CONFLICT OF INTEREST. Comprehensive Wealth Management has a financial incentive to recommend that clients borrow money and place those funds under management with Comprehensive Wealth Management. This financial incentive creates a potential conflict of interest between the client and Comprehensive Wealth Management.

Potential Effect of Advisor Paying Transaction Costs

Because in the CWM Program, Comprehensive Wealth Management, pays for the cost of securities transactions and has the full discretionary power to decide if and when a securities transaction is made, Comprehensive Wealth Management has the financial incentive not to make securities transactions. Paying for the securities transactions in the client's investment portfolio creates a potential conflict of interest where Comprehensive Wealth Management has the financial incentive not to make a securities transaction in the client's account when it is in the client's best interest to do so.

Insurance Commissions

The associated persons of Comprehensive Wealth Management may also be licensed life and disability insurance agents with all the appropriate state Departments of Insurance, 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 Comprehensive Wealth Management with regard to these products.

Risk and Taxes

All investments involve risk (the amount of which may vary significantly) that investment performance can never be predicted or guaranteed and that the value of your portfolio will fluctuate due to market conditions and other factors. You should also understand that all or a portion of your securities may be sold either at the initiation of or during the course of management of your account under the CWM Program. You are responsible for all tax liabilities arising from such transactions, and you are encouraged to seek the advice of a qualified tax professional.

Termination of Participation in the Program

You may terminate your participation in the CWM Program at any time upon written notice to Comprehensive Wealth Management without penalty, subject to the payment of any fees incurred and allowing for at least two business days for Comprehensive Wealth Management to process your termination instruction. Once your authorizations granted to Comprehensive Wealth Management have been terminated, your account will be charged Schwab's then-current termination and/or closing fees and other applicable charges for account at Schwab.

Depending on the size of your account, some bonds may be purchased for your account by Comprehensive Wealth Management in positions that are smaller than marketable round lots (sometimes called "odd-lots"). If you have an odd lot bond, it may be more difficult to sell than a round lot, and the sale price may be substantially lower than the price which you paid or the price at which the position previously was valued. If you decide to terminate your participation in a program and do not plan to hold the odd lot until maturity, it may be advisable for you to direct the sale of the odd lot when you terminate your CWM Program participation, as Comprehensive Wealth Management may be able to obtain a better price.

Adding Securities to Your Account

You may add cash, certain mutual fund shares, stock or bonds to your account, but Comprehensive Wealth Management reserves the right to decline to accept particular securities or require you to wait a specific period before depositing certain securities. You cannot fund your account with certain securities, including certain foreign securities (other than American Depositary Receipts) or restricted securities. When depositing securities to your account, you should bear in mind that Comprehensive Wealth management may decide to sell all or a substantial portion of such securities and that you will be responsible for any tax liabilities resulting from such transactions.

About Comprehensive Wealth Management

Comprehensive Wealth Management is primarily engaged in the business as an investment adviser and spends most of its time on that business.

Education and Business Background

The following Comprehensive Wealth Management personnel have supervisory responsibility for the CWM Program and are responsible for determining the investment advice provided to clients in the CWM Program:

Gary M. Arford
Born 1955
Attended the U.S. Air Force Academy
Graduated from Concordia College
CFP, CSA & CCIM Designations
Life & Disability Insurance Licenses
Employment:
Comprehensive Wealth Management since 06/2001
Geneos Wealth Management from 08/2003 to 12/2005
Commonwealth Financial Network from 10/2000 to 07/2003

Brian J. Lockett
Born 1978
Graduated from Washington State University
Series 7 & 66 Licenses
Life & Disability Insurance Licenses
Employment:
Comprehensive Wealth Management since 01/2002
Geneos Wealth Management since 02/2004
Commonwealth Financial Network 09/2002 to 07/2003

Morgan L. Arford
Born 1983
No Post-Secondary Formal Education
Series 65 License
Employment:
Comprehensive Wealth Management since 06/2004
Student 01/2004 to 06/2004

Education and Business Standards

Persons giving advice to clients of Comprehensive Wealth Management must either be a Registered Investment Adviser, and Investment Adviser Representative, or a Certified Financial Planner designee.

End of Schedule H