

## **Item 1 Cover Page**

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March 11, 2015

**This brochure provides information about the qualifications and business practices of CompleteAdvisors. If you have any questions about the contents of this brochure, please contact us at (516) 240-6161. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about CompleteAdvisors also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 Material Changes**

December 18, 2014 – Item 1 was updated for a change in the office address.

March 11, 2015 – Because regulatory assets under management exceed \$61 million as of December 31, 2014, CompleteAdvisors is in the process of transferring its registration to the U.S. Securities and Exchange Commission (“SEC”) in accordance with federal and New York State securities laws. This Brochure will be updated when the transition is completed.

The material changes discussed above are only those changes that have been made to this brochure since the firm’s last annual update of the brochure. The date of the last annual update of the brochure was February 6, 2015.

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#### **Item 4 Advisory Business**

CompleteAdvisors is a registered investment advisor firm registered with the State of New York securities regulators as of January 8, 2010 and has a registration pending with the SEC in accordance with federal and State of New York securities laws. The firm offers investment advisory services to individuals, corporations or other business entities. The owner of the firm is Evan M. Levine, President and Chief Compliance Officer.

##### Advisory Services

CompleteAdvisors' ("Advisor") principal service is providing fee-based investment advisory services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the client's objectives. The advisors primary approach is to design portfolios that provide investors with sufficient confidence in reaching their stated goals. A strategic, not tactical, approach is employed. Generally, changes are made to the portfolio if an investment vehicle is discovered that better represents a broad asset class - or offers the same representation at a lower cost. Changes also may occur if an investors overall financial situation and/or goals & objectives change. Rebalancing occurs when there is significant drift from the original allocation targets. Changes are rarely based on anticipating the short-term direction of the markets or economy. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance. The Advisor may use any of the following: exchange listed securities, over-the-counter securities, foreign securities, warrants, corporate debt securities, CDs, variable life insurance, variable annuities, municipal securities, mutual funds, United States government securities, options in securities and commodities, futures contracts on tangibles and intangibles, interests in partnerships investing in real estate and oil and gas interests to accomplish this objective. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager's tenure, and/or overall career performance.

##### Qualified Retirement Plan Consulting Services

CompleteAdvisors provides services to qualified retirement plans including employee communication and education programs, and the investment selection and monitoring process, including its investment policy statement, hereinafter referred to as the "IPS". With regard to the IPS, the Advisor will assist the Plan Sponsor in adopting a suitable IPS, amending it from time to time, and will provide information and recommendations, consistent with the IPS, to aid the Plan Sponsor in selecting and monitoring investments offered to Participants in the Plan.

The Advisor's roles and actions in fulfilling all responsibilities pertaining to qualified plan services shall not include those of the Plan's Trustee, and will be performed solely at the direction of the Plan Sponsor, its authorized officers, employees and/or agents. At no time will the Advisor accept, maintain possession of, or have custodial responsibility for, the Plan's assets. The Advisor will not conduct or effect the purchase or sale of any assets of the Plan on behalf of the Plan Sponsor or Plan Participants. As part of its services to the Plan, the Advisor will provide investment education to Plan Participants, but will not provide specific investment advice to any Participant, person or entity related to the Plan other than the Plan Sponsor, except

where the Participant, person or entity is separately an advisory client of the Advisor. Communicational and educational activities in which the Advisor engages related to Participants in the Plan shall be solely at the direction of the Plan Sponsor, and shall not be represented by the Advisor or Plan Sponsor as investment, tax or legal advice. The Advisor is not licensed to provide, shall not provide, nor be construed to provide, the services of an attorney or accountant.

#### Selection of Other Advisors

CompleteAdvisors may recommend and refer clients to unaffiliated strategists and money managers or investment advisors through Managed Account programs sponsored by a third-party provider. In these arrangements, the Client will then enter into a program and investment advisory agreement with the program sponsor and sub-advisors. CompleteAdvisors will assist and advise the Client in establishing investment objectives for the sub-advisors and continue to provide oversight of the Client account and ongoing monitoring of the activities of the sub-advisors. The sub-advisors will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the program sponsor will charge a program fee that includes the investment advisory fee of the sub-advisors, the administration of the program and trading, clearance and settlement costs. The program sponsor will add CompleteAdvisors investment advisory fee (described below in the answer to Item 5) and will deduct the overall fee from the Client account quarterly in advance based on the fair market value at the end of the preceding quarter.

The Client, prior to entering into an agreement with a Managed Account program sponsored by a third-party provider, will be provided with the program sponsor's Brochure that makes the appropriate disclosures. In addition, CompleteAdvisors and its Client will agree in writing that the selected program sponsor will manage the Client's account on a discretionary basis.

#### Financial Planning

CompleteAdvisors provides Financial Planning services. The Advisor's Financial Planning services may include recommendations for portfolio customization based on their client's investment objectives, goals and financial situation. Financial Planning Services may also include recommendations relating to estate planning and investment strategies as well as tailored investment advice.

CompleteAdvisors will tailor its advisory services to its client's individual needs based on meetings and conversations with the client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client's requirements.

CompleteAdvisors does not provide portfolio management services to wrap fee programs.

CompleteAdvisors manages client assets and as of December 31, 2014 has \$61,168,000 in discretionary assets under management.

## **Item 5 Fees and Compensation**

### Asset Management Fees

Pursuant to an investment advisory contract signed by each client, the client will pay CompleteAdvisors a quarterly Management Fee, payable in advance, based on the amount of the assets to be managed by the Advisor as of the opening of business on the first business day of each quarter. The management fee will be in the range of .35% to .95%.

These fees may be negotiated by CompleteAdvisors at its sole discretion. The custodian will directly deduct investment Advisory fees from the client account on a quarterly basis, and the custodian will send a quarterly statement to the client.

### Hourly Fee

Some clients will contract to have investment advisory advice provided based on an hourly fee rather than based on the assets under management. The Advisor's hourly fee will be billed at a rate of \$175 per hour, but may be negotiated in advance. Hourly fee-based clients are billed on a monthly basis upon completion of work performed.

### Fixed Fee

CompleteAdvisors will charge a fixed fee for comprehensive financial planning services of \$1,500 per plan as contracted with client. Fixed fees may be negotiated in advance based at the discretion of the Advisor. Fixed fee-based clients are billed \$750 upon signing of the agreement, and the remainder on delivery of the plan. All plans will be completed within six months of the agreement date.

All fees paid to CompleteAdvisors for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund's or variable product's prospectus. These fees will generally include a management fee, other fund expenses. A client could invest in these products directly, without the services of CompleteAdvisors. In that case, the client would not receive the services provided by CompleteAdvisors which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by CompleteAdvisors to fully understand the total fees to be paid.

CompleteAdvisors will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will CompleteAdvisors accept or maintain custody of a client's funds or securities. Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisors fee is separate and distinct from the custodian and execution fees.

Clients may request to terminate their advisory contract with CompleteAdvisors, in whole or in part, by providing advance written notice. Client's advisory agreement with the Advisor is non-transferable without Client's written approval.

CompleteAdvisors management fee is payable in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client.

Neither CompleteAdvisors nor its supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

#### **Item 6 Performance-Based Fees and Side-by-Side Management**

CompleteAdvisors does not charge performance-based fees.

#### **Item 7 Types of Clients**

CompleteAdvisors will offer its services to individuals, trusts or charitable organizations, corporations or business entities.

CompleteAdvisors cumulative minimum account is \$250,000. However, based on facts and circumstances CompleteAdvisors may, at its sole discretion, accept accounts with a lower value.

#### **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

CompleteAdvisors utilize unaffiliated money managers or investment advisors through Managed Account programs. Those money managers or investment advisors will create and design the Client's portfolio based upon each client's investment objectives and will utilize their own analysis and methodology in that portfolio design.

The investment strategies the Advisor will implement may include long term purchases of securities held at least for one year.

Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.

The methods of analysis and investment strategies followed by CompleteAdvisors are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

CompleteAdvisors does not primarily recommend a particular type of security. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities causing the loss of some or all of the investment, including changes in interest rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative affects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

## **Item 9 Disciplinary Information**

Neither CompleteAdvisors nor its management person has had any legal or disciplinary events, currently or in the past.

## **Item 10 Other Financial Industry Activities and Affiliations**

Neither CompleteAdvisors nor its management person is registered either as a broker-dealer or a registered representative of a broker-dealer.

Neither CompleteAdvisors nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

CompleteAdvisors does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund” and offshore fund, other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Evan M. Levine, investment advisory representative for CompleteAdvisors is also licensed and registered as an insurance agent for various insurance companies and spends approximately 25% of his time on insurance related business. Therefore, he will be able to purchase insurance products for any client in need of such services and will receive separate, yet typical compensation in the form of commissions for the purchase of insurance products. This creates a conflict of interest. A conflict of interest exists because of the receipt of additional compensation by Mr. Levine. Clients are not obligated to use him or CompleteAdvisors for insurance products services. However, in such instances, there is no advisory fee associated with these insurance products.

CompleteAdvisors does recommend or select other investment advisors for clients. For more specific detail see the response to Item 4 above.

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

CompleteAdvisors is registering with the SEC and maintains a Code of Ethics pursuant to SEC rule 204A-1. CompleteAdvisors has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of CompleteAdvisors deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of CompleteAdvisors are conducted in a manner that avoids any conflict of interest between such



persons and clients of the adviser or its affiliates. CompleteAdvisors collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. CompleteAdvisors maintains a code of ethics and they will provide a copy to any client or prospective client upon request.

CompleteAdvisors and/or its investment advisory representatives may from time to time purchase or sell products that they may recommend to clients. CompleteAdvisors and/or its investment advisory representatives have a fiduciary duty to put the interests of their clients ahead of their own.

CompleteAdvisors requires that its investment advisory representatives follow its basic policies and ethical standards as set forth in its Code of Ethics. CompleteAdvisors has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of CompleteAdvisors deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of CompleteAdvisors are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. CompleteAdvisors collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. CompleteAdvisors Code of Ethics is available upon request.

## **Item 12 Brokerage Practices**

CompleteAdvisors does not recommend brokers to clients.

CompleteAdvisors does not receive research or other products or services other than execution from a broker-dealer or third party as a result of client securities transactions.

CompleteAdvisors does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

CompleteAdvisors does not recommend that clients use a particular broker-dealer for execution and/or custodial services.

CompleteAdvisors will allow clients to direct brokerage at the firm's sole discretion. Clients should be aware that if they direct CompleteAdvisors to a particular broker-dealer for execution CompleteAdvisors may be unable to achieve most favorable execution of client transactions. Directing brokerage may cost clients more money than if CompleteAdvisors were to execute transactions at the broker-dealer where it has an established relationship. The client may pay higher brokerage commissions because CompleteAdvisors may not be able to aggregate orders to reduce transaction costs or the client may receive less favorable prices.

CompleteAdvisors utilizes the model programs of other unaffiliated money managers therefore this is no ability to aggregate trades. All client accounts are charged the same price per transaction.

### **Item 13 Review of Accounts**

Accounts are monitored on an ongoing basis. Evan M. Levine, President/CCO of CompleteAdvisors will review client accounts. Client accounts will also be reviewed when Levine becomes aware of a change in client's investment objective, a change in market conditions, change of employment, re-balancing of assets to maintain proper asset allocation and any other activity that is discovered as the account is reviewed.

The client will receive written statements no less than quarterly from the trustee or custodian. In addition, the client will receive other supporting reports from Mutual Funds, Asset Managers, Trust Companies or Custodians, Insurance Companies, Broker/Dealers and others who are involved with client accounts.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

Asset Allocation Accounts are re-balanced on a quarterly basis and re-optimized when deemed necessary by the Advisor or by third-party money manager for those participating in the Asset Management Program. Re-balancing is accomplished by reallocating assets to original asset targets and re-optimizing involves setting new target asset category percentages.

### **Item 14 Client Referrals and Other Compensation**

CompleteAdvisors is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

CompleteAdvisors does not directly or indirectly compensate any person who is not a supervised person for client referrals.

### **Item 15 Custody**

CompleteAdvisors does not have custody of client funds or securities. However, the client will receive written statements no less than quarterly from the custodian. CompleteAdvisors encourages clients to carefully review their account statements for any inaccuracies. Any discrepancies should be immediately brought to the firm's attention.

### **Item 16 Investment Discretion**

CompleteAdvisors generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client for each transaction. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by CompleteAdvisors.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement

containing all applicable limitations to such authority. All discretionary trades made by CompleteAdvisors will be in accordance with each client's investment objectives and goals.

### **Item 17 Voting Client Securities**

CompleteAdvisors will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, CompleteAdvisors cannot give any advice or take any action with respect to the voting of these proxies. The client and CompleteAdvisors agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

### **Item 18 Financial Information**

CompleteAdvisors does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, and is not required to file a balance sheet.

CompleteAdvisors has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If CompleteAdvisors does become aware of any such financial condition, this brochure will be updated and clients will be notified.

CompleteAdvisors has never been the subject of a bankruptcy petition.