

Part 2A of Form ADV: *Firm Brochure*



CRITERION
CAPITAL INVESTMENTS

Criterion Wealth Management Insurance Services, Inc.

d.b.a. Criterion Capital Investments (CCI)

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This brochure provides information about the qualifications and business practices of Criterion Wealth Management Insurance Services, Inc. also doing business as Criterion Capital Investments. If you have any questions about the contents of this brochure, please contact us at 661-254-2543 or jason@criterionwealth.com. 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. Registration does not imply a certain level of training or skill.

Additional information about Criterion Wealth Management Insurance Services, Inc. and as Criterion Capital Investments also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 142180.

Item 2 Material Changes

Since the last update to this Brochure we have changed, modified or added the following important disclosures:

- **Item 5 – Fees and Compensation**
 - CCI no longer offers the Alternative Investment Fee schedule to new clients. Pre-existing CCI clients can elect to maintain their existing fee structure in effect at the time they entered into the advisory relationship.

- **Item 17 – Voting Client Securities**
 - CCI no longer votes proxies on behalf of clients. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

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Item 4 Advisory Business

Criterion Wealth Management Insurance Services, Inc. is an SEC-registered investment adviser with its principal place of business located in Valencia, California. Criterion Wealth Management Insurance Services, Inc. began conducting business in May of 2004.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Mr. Robert A. Gravette, Owner
- Mr. Zachary P. Herbert , Owner

Criterion Wealth Management Insurance Services, Inc. conducts business under two business names and models: 1) Criterion Capital Investments (“CCI”) and 2) Criterion Wealth Management (“CWM”). CCI and CWM offer similar but distinctly different services and varying fee structures. The following information in this Disclosure Brochure only addressed the services offered under Criterion Capital Investments and does not cover any services, fees or disclosures for CWM related services. Clients and prospective clients of CWM should obtain a copy of the separate Disclosure Brochure specifically for CWM services.

ASSET MANAGEMENT

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and provide investment advisory services to our clients on a discretionary basis based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

CCI shall have limited investment authority and discretion and may purchase, sell, generally deal in or exchange assets for the client's account as it shall determine without obtaining specific client consent. Clients, nevertheless, have the opportunity to place reasonable restrictions on the types of investments to be held in their account. Clients retain individual ownership of all securities.

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Risk-based Allocation Portfolio Approach

Our firm provides portfolio management services to clients using a risk-based modified asset allocation portfolio approach. Each client receives a personalized variation of a model asset allocation portfolio which is designed to meet a particular investment goal.

Account supervision is guided by the client's stated objective and risk score (i.e., growth, income, preservation, etc.), as well as tax considerations.

Clients have the opportunity to place reasonable restrictions on the types of investments to be held in their account. Clients retain individual ownership of all securities.

The Portfolios are assigned a model allocation and a benchmark, which is used in conjunction with macro-economic factors to determine the account rebalancing and introduction of new assets classes in a client's portfolio.

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client's financial circumstances, we will:

1. Determine each client's risk score through the use of specific software. Each client's risk score will be included in their file and reviewed at least annually. In addition, CCI will contact each client to determine whether there have been any changes in the client's financial situation or investment objectives, and whether the client wishes to impose investment restrictions or modify existing restrictions;
2. be reasonably available to consult with the client; and
3. maintain client suitability information in each client's file.

WEALTH MANAGEMENT

For household accounts with assets over \$5,000,000, CCI may offer wealth management services designed to provide a review of various aspects of a client's financial situation and a needs analysis tailored to their specific financial situation.

Through a series of personal meetings with the client we will gather the necessary information required to make recommendations and referrals to outside unaffiliated experts for implementation. Clients are under no obligation to implement any recommendation made as a result of our wealth management service.

Services In General

Our investment recommendations are not limited to any specific product or service offered by a broker dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers & ADRs
- Warrants
- Corporate debt securities (other than commercial paper)

- Commercial paper
- Certificates of deposit
- Municipal securities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Private Equity Investments
- Hedge Fund Investments
- Private Placement offerings

WRAP FEE PROGRAMS

CCI does not sponsor or manage any wrap fee programs.

AMOUNT OF MANAGED ASSETS

As of 12/31/2016, Criterion Wealth Management Insurance Services, Inc. collectively had \$190,483,563 of discretionary clients' assets under management on a discretionary basis. The firm does not currently manage any non-discretionary accounts.

Item 5 Fees and Compensation

ASSET MANAGEMENT

CCI has two portfolio management fee schedules to determine the annualized fee for advisory services. CCI's advisory fees, as set forth in the below schedules, are charged as a percentage of assets under management. The applicability of each fee schedule is determined by the nature and scope of the advisory services to be provided in addition to the type of securities managed in the client's portfolio.

CCI's fees are paid quarterly in arrears and are payable on the first day of the calendar quarter. The fees for the first quarter under management will be prorated.

1) Standard Asset Based Management Fee CCI shall utilize this fee schedule for advisory services encompassing the following:

- Stocks, bonds, cash management
- Asset allocation, diversification strategies

- Strategic and tactical management using multiple asset categories and securities
- Investment selection and monitoring
- Account reporting

<u>Assets under Management:</u>	<u>Annual Fee (%)</u>
First \$500,000	1.50%
Next \$500,001 - \$1,000,000	1.25%
Next \$1,000,001 - \$3,000,000	1.00%
Next \$3,000,001 - \$10,000,000	0.65%
More than \$10,000,000	0.50%

Fees are based on a three month average portfolio value as of the last business day of the prior calendar quarter. CCI charges 0.15% for managing short-term liquid investment accounts.

2) Performance Based Fee: “Qualified Client Required”

10% of Account profits with a 0.50% minimum annual fee. This option is available only for Clients who meet the definition of “**qualified client**” as described below.

Qualified Client Requirement: To be eligible for the Performance-Based Management Fee, Client must be a qualified client, as defined by the Securities & Exchange Commission, which as of the date of this agreement means: **(i)** A natural person who, or a company that, immediately after entering into an advisory contract has at least \$1,000,000 under the management of the investment adviser; or **(ii)** A natural person who, or a company that, the investment adviser reasonably believes prior to entering into the contract, either has a net worth of more than \$2,100,000, exclusive of primary residence and net of any debt secured by Client’s residence taken out in the last 60 days except for purchase of the residence. In signing this Agreement and selecting the Performance-Based Management Fee (without having CCI manage \$1 million), the Client acknowledges meeting the \$2,100,000 net-worth requirement.

The Performance-Based Management Fee has two components:

i. Quarterly Fee

The Quarterly Fee is 0.125% of the Account value (0.50% annualized), charged in arrears at the end of each calendar quarter. Quarterly Fees will be pro-rated for the partial quarter at commencement of management and based on the end of quarter value of the Client’s Account. If the Account is terminated by either the Client or CCI in the middle of a quarter, the account will be billed prior to removal of CCI management or invoiced directly for the partial quarter fees due CCI.

ii. 10% Incentive Fee

The 10% Incentive Fee is defined as 10% of the account profits achieved over the quarterly billing period. Profits are defined as the change in the portfolio value, net of deposits/withdrawals. The initial billing period is the first full quarter plus the remainder of the partial calendar quarter that includes the account's inception. After the initial billing period, each subsequent billing period would consist of the next calendar quarter. If the Account owes no 10%-of-Profits Fee at the end of a billing period (e.g., because of negative investment performance), subsequent performance based fees will be calculated using a "high-water mark". The high-water mark is the value of the Account (net of deposits/withdrawals) on the date of the last performance based fee or the account's inception, whichever is most recent. CCI reserves the right to make appropriate adjustments to an Account's high-water mark following withdrawals; clients will be notified in writing of any such adjustments. The incentive fee is determined against the high water mark, so that there is no incentive fee with respect to an investor's account when it has fallen below the amount at which the incentive fee previously charged (adjusted for deposits and/or withdrawals) or, if no incentive fee has ever been assessed, the amount on the date of initial investment with CCI. It should be noted, once an incentive fee is paid to CCI with respect to the overall account, it will be retained by CCI despite the fact that such account may incur subsequent losses. CCI's incentive fee will be determined as of the end of each calendar quarter. If however, a client withdraws all of a portion of its account other than at the end of a calendar quarter, the incentive fee with respect to such withdrawn amounts will be computed as of the date of redemption, withdrawal or distribution was a quarter end.

Alternative Asset Compensation

When appropriate and suitable, our adviser representatives may recommend certain Alternative Asset investments (i.e. private securities) to CCI clients in which the associated person may receive separate and typical compensation (i.e. commissions) when acting in their separate capacities as registered representatives of Ausdal Financial Partners, Inc. Clients are under no obligation to purchase such securities. If a CCI client chooses to invest in these securities and an associated person of CCI receives separate commission compensation from the sale of an alternative investment, that asset will be excluded from the CCI fee calculation as described above.

This creates a conflict of interest between the CCI and its clients. Please see the important disclosures below "Commission Compensation" and additional disclosures in Item 10 "Other Industry Affiliations".

Commission Compensation

As disclosed in Item 10, management and associated persons of our firm are separately licensed as registered representatives of Ausdal Financial Partners, Inc. a FINRA member broker dealer. Associated persons may also be licensed as insurance agents or brokers of various companies. In their separate capacity, these individuals are able to implement investment recommendations for advisory clients for separate and typical compensation (i.e., commissions, 12-b1 fees or other sales-related forms of compensation). In some instances, depending on the size of the transaction, advisory fees will be discounted or waived in lieu of commissions earned. Commissions will not be credited to any future advisory fees. This presents a conflict of interest

to the extent that these individuals recommend that a client invest in a security which results in a commission being paid to the individuals. Clients are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

GENERAL INFORMATION

Termination of the Advisory Relationship: A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, earned fees will be promptly deducted from client accounts.

Mutual Fund Fees: All fees paid to Criterion Wealth Management and as Criterion Capital Investments for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. Whenever possible, we attempt to recommend funds that have low fees and that are also tax efficient.

Wrap Fee Programs and Separately Managed Account Fees: Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the independent advisers, which may be charged as part of a wrap fee arrangement. In a wrap fee arrangement, clients pay a single fee for advisory, brokerage and custodial services. Client's portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be charged to clients.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Grandfathering of Fee Arrangements: Pre-existing advisory clients are subject to Criterion Wealth Management and as Criterion Capital Investments' minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

ERISA Accounts: CCI is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. . As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Criterion Wealth Management and as Criterion Capital Investments may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Criterion Wealth Management and as Criterion Capital Investments' advisory fees.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.

Limited Negotiability of Advisory Fees: Although CCI has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between CCI and each client.

Account Minimums: CCI requires a minimum of \$1,000,000 to establish a new advisory account; however, the minimum may be waived at the sole discretion of CCI.

When offering asset management services limited to Alternative Investments only, a minimum of \$50,000 is typically required upon engagement.

Item 6 Performance-Based Fees and Side-By-Side Management

As noted in Item 5 above, CCI Clients may elect a performance-based fee. Performance-based fee arrangements may create certain conflicts of interest due to the fact that: (i) performance-fee arrangements may create an incentive for the manager to make investments that are riskier or more speculative than would be the case in the absence of a performance fee; (ii) the manager may receive compensation with regard to unrealized (not sold) appreciation as well as realized (sold) gains in the Client's account; and (iii) the fees charged by managers in performance-fee arrangements may be higher or lower than fees charged by other advisers for comparable services.

We endeavor at all times to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser; accordingly, we take the following steps to address these conflicts:

1. We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and employees to earn more compensation from advisory clients who pay performance-based fees;
2. We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
3. Our management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to that client's needs and circumstances;
4. We have implemented policies and procedures for fair and consistent allocation of investment opportunities among all client accounts;
5. We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients and equitable treatment of all clients.

PERFORMANCE-BASED FEES WILL ONLY BE CHARGED IN ACCORDANCE WITH THE PROVISIONS OF REG. 205-3 OF THE INVESTMENT ADVISERS ACT OF 1940 AND/OR APPLICABLE STATE REGULATIONS. THE FEES WILL NOT BE OFFERED TO ANY CLIENT RESIDING IN A STATE IN WHICH SUCH FEES ARE PROHIBITED.

Item 7 Types of Clients

CCI provides investment advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans(other than plan participants)
- Charitable organizations
- Corporations or other businesses not listed above

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

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of

the economic and financial factors considered in evaluating the stock.

Technical Analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases. When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A short-term purchase strategy poses risks should the anticipated price swing not materialize; we are then left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss.

In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Trading. We purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of our predictions of brief price swings.

Utilizing a trading strategy creates the potential for sudden losses if the anticipated price swing does not materialize. Moreover, under those circumstances, we are left with few options:

- having a long-term investment in a security that was designed to be a short-term purchase
- OR
- the potential of having to taking a loss.

In addition, because this strategy involves more frequent trading than does a longer-term strategy, there will be a resultant increase in brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains. As a result of these attributes, trading as a strategy is utilized infrequently.

Short sales. We borrow shares of a stock for your portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed shares are then sold. On the agreed-upon future date, we buy the same stock and return the shares to the original owner. We engage in short selling based on our determination that the stock will go down in price after we have borrowed the shares.

If we are correct and the stock price has gone down since the shares were purchased from the original owner, the client account realizes the profit.

Short selling results in some unique risks:

1. *Losses can be infinite.* A short sale loses when the stock price rises, and a stock is not limited (at least, theoretically) in how high it can go. For example, if you short 100 shares at \$50 each, hoping to make a profit but the shares increase to \$75 per share, you'd lose \$2,500. On the other hand, the price of a stock cannot fall below \$0, which limits your potential upside.
2. *Short squeezes can wring out profits.* As stock prices increase, short seller losses also increase as sellers rush to buy the stock to cover their positions. This increase in demand, in turn, further drives the prices up.
3. *Timing.* Even if we are correct in determining that the price of a stock will decline, we run the risk of incorrectly determining when the decline will take place, i.e., being right too soon. Although a company is overvalued, it could conceivably take some time for the price to come down; during which you are vulnerable to interest, margin calls, etc.
4. *Inflation.* History has shown that over the long term, most stocks appreciate. Even if a company barely improves over time, inflation should drive its share price up somewhat. In fact, short selling may not be appropriate in times of inflation for that very reason, as prices may adjust upwards regardless of the value of the stock.

Margin transactions. As a standard practice, we do not employ the use of margin for transactions. We may purchase stocks for your portfolio with money borrowed from your brokerage account, the case of timing of previous buy or sells. Margin purchases are only used for very short term cash flow requirements.

A risk in margin trading is that, in volatile markets, securities prices can fall very quickly. If the value of the securities in your account minus what you owe the broker falls below a certain level, the broker will issue a “margin call”, and you will be required to sell your position in the security purchased on margin or add more cash to the account. In some circumstances, you may lose

more money than you originally invested.

Option writing. We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock will increase substantially before the option expires.
- A put gives us the holder the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock will fall before the option expires.

We will use options to speculate on the possibility of a sharp price swing. We will also use options to "hedge" a purchase of the underlying security; in other words, we will use an option purchase to limit the potential upside and downside of a security we have purchased for your portfolio.

We use "covered calls", in which we sell an option on security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price.

We use a "spreading strategy", in which we purchase two or more option contracts (for example, a call option that you buy and a call option that you sell) for the same underlying security. This effectively puts you on both sides of the market, but with the ability to vary price, time and other factors.

A risk of covered calls is that the option buyer does not have to exercise the option, so that if we want to sell the stock prior to the end of the option agreement, we have to buy the option back from the option buyer, for a possible loss.

A risk of spreading strategies is that the ability to fully profit from a price swing is limited.

Risk of Loss. Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

BROKER DEALER REGISTRATIONS

Associated persons of CCI are registered securities representatives and investment adviser representatives of Ausdal Financial Partners, Inc., a registered broker-dealer, member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and a registered investment adviser. In these capacities associated persons may recommend securities, insurance, advisory, or other products or services, and receive compensation if products are purchased through Ausdal Financial Partners, Inc. Thus, a conflict of interest exists between the interests of the associated persons and those of the advisory clients.

INSURANCE LICENSES

Associated persons of our firm, in their individual capacities, are agents for various insurance companies. As such, these individuals are able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

HOW WE HANDLE OUR CONFLICTS OF INTERESTS

Clients should be aware that the receipt of additional compensation by CCI and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. CCI endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for us or our employees to earn compensation from the referral of clients to other registered investment advisers;
- we disclose to the client in a separate disclosure document the compensation we receive in exchange for the client's referral to the selected investment adviser;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and

- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

CCI and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

CCI's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to Jason@criterionwealth.com, or by calling us at (661) 254-2543.

CCI or individuals associated with our firm may buy securities for the firm or for themselves from our advisory clients; or sell securities owned by the firm or the individual(s) to our advisory clients. We will ensure, however, that such transactions are conducted in compliance with all the provisions under Section 206(3) of the Advisers Act governing principal transactions to advisory clients.

CCI and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be

recommended to a client.

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("block trading"). Please refer to the "Brokerage Practices" section in this Brochure for information on our block trading practices.

A potential conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

Item 12 Brokerage Practices

In placing its orders to purchase or sell securities in accounts, principals of CCI may elect to aggregate orders. In so doing, the firm will not aggregate transactions unless aggregation is consistent with its duty to seek best execution and the terms of adviser's investment advisory agreement with each client for which trades are being aggregated; no advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all adviser's transactions in that security on a given business day, with transaction costs shared pro-rata based on each client's participation in the transaction; CCI will prepare, before entering an aggregated order, a written statement ("Allocation Statement") specifying the participating client accounts and how it intends to allocate the order among those clients.

If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement; if the order is partially filled, it will be allocated pro-rata based on the Allocation Statement; notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment and the reason for different allocation is explained in writing and is approved in writing by CCI's compliance officer no later than one hour after the opening of the markets on the trading day following the day the order was executed.

CCI's books and records will separately reflect, for each client account, the orders of which are aggregated, the securities held by, and bought and sold for that account; funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the client's cash nor their securities will be held collectively any longer than is necessary to settle the purchase or sale in question on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement; CCI will receive no additional compensation of any kind as a result of the proposed aggregation; and individual investment advice and treatment will be accorded to each advisory client.

CCI participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member **FINRA/SIPC/** ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. **TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. CCI receives some benefits from TD Ameritrade through its participation in the Program.** CCI may recommend TD AMERITRADE to clients for custody and brokerage services. There is no direct link between CCI's participation in the program and the investment advice it gives to its clients, although CCI receives economic benefits through its participation in the program that are typically not available to TD AMERITRADE retail investors.

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to CCI by third party vendors.

TD AMERITRADE may also have paid for business consulting and professional services received by CCI's related persons. Some of the products and services made available by TD AMERITRADE through the program may benefit CCI but may not benefit its Client accounts. These products or services may assist Adviser in managing and administering client accounts, including accounts not maintained at TD AMERITRADE. Other services made available by TD AMERITRADE are intended to help CCI manage and further develop its business enterprise. The benefits received by CCI or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD AMERITRADE. As part of its fiduciary duties to clients, the firm endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by CCI or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the CCI's choice of TD AMERITRADE for custody and brokerage services.

CCI may receive client referrals from TD AMERITRADE through its participation in TD AMERITRADE AdvisorDirect (the "referral program"). In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, CCI may have been selected to participate in AdvisorDirect based on the amount and profitability to TD AMERITRADE of the assets in, and trades placed for, client accounts maintained with TD AMERITRADE. TD AMERITRADE is a discount broker-dealer independent of and unaffiliated with CCI and there is no employee or agency relationship between them.

TD AMERITRADE has established the referral program as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD AMERITRADE does not supervise CCI and has no responsibility for CCI's management of client portfolios or CCI's other advice or services. CCI pays TD AMERITRADE an on-going fee for each successful

client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to CCI ("Solicitation Fee"). CCI will also pay TD AMERITRADE the Solicitation Fee on any advisory fees received by CCI from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired CCI on the recommendation of such referred client. CCI will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD AMERITRADE to its clients. For information regarding additional or other fees paid directly or indirectly to TD AMERITRADE, please refer to the TD AMERITRADE AdvisorDirect Disclosure and Acknowledgement Form.

CCI's participation in AdvisorDirect raises potential conflicts of interest. TD AMERITRADE will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD AMERITRADE and whose client accounts are profitable to TD AMERITRADE. Consequently, in order to obtain client referrals from TD AMERITRADE, CCI may have an incentive to recommend to clients that the assets under management by CCI be held in custody with TD AMERITRADE and to place transactions for client accounts with TD AMERITRADE. In addition, CCI has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD AMERITRADE or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. CCI's participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

CCI associates may not, but the same individuals in their capacities as registered representatives may receive payments from certain mutual fund companies distributed pursuant to a 12b-1 or 12b-2 distribution plan or other such plans as compensation for administrative services. As such, a conflict of interest may exist with respect to recommendations to buy or sell such securities.

Block Trades. From time to time, we may combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions plus transaction fees. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment. In certain cases, such as concentrated position, low cost basis, dollar cost averaging or other extenuating circumstances; some accounts may not be included in block trading, and, therefore, likely traded after block traded accounts. The removal of an account from block trading occurs at our discretion and only to the extent that we feel it in the client's best interest.

Item 13 Review of Accounts

ASSET MANAGEMENT

REVIEWS: While the underlying securities within Model Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of the investment objectives and guidelines of each model portfolio as well as any investment restrictions provided by the client. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by: Mark A. MacArthur.

REPORTS: In addition to the monthly statements and confirmations of transactions that clients receive from their custodian, CCI generated quarterly reports summarizing account performance, balances and holdings are made available upon request. These reports will also remind the client to notify us if there have been changes in the client's financial situation or investment objectives and whether the client wishes to impose investment restrictions or modify existing restrictions.

Item 14 Client Referrals and Other Compensation

Criterion Wealth Management Insurance Services, Inc. is currently engaged in a solicitor agreement with TD Ameritrade through the AdvisorDirect program, see item 12 above. It is CCI's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 Custody

We may directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your account(s) causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian.

As part of the fee billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell; and/or
- determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

As previously disclosed in Item 4 of this brochure, our firm does not provide discretionary asset management services.

Item 17 Voting Client Securities

CCI will not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer consulting assistance regarding proxy issues to clients.

Item 18 Financial Information

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. CCI has no additional financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

CCI has not been the subject of a bankruptcy petition at any time during the past ten year.

Part 2B of Form ADV: *Brochure Supplement*

Mark Andrew MacArthur



CRITERION
CAPITAL INVESTMENTS

**Criterion Wealth Management Insurance Services, Inc.
dba: Criterion Capital Investments**

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March 31, 2017

This brochure supplement provides information about Mark Andrew MacArthur that supplements the Criterion Wealth Management brochure. A copy of that brochure was previously made available to you. Please contact Criterion Wealth Management if you'd like to request another copy of the brochure or if you have any questions about the contents of this supplement.

Additional information about Mark Andrew MacArthur is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Name: Mark Andrew MacArthur

Year of Birth: 1968

Education:

- Bachelor's Degree, The Master's University, Newhall, CA (1990)

Business Background:

- Criterion Wealth Management, Valencia, CA, Senior Advisor, 10/2006 – Present
- Robert B. Ausdal & Co., Inc., Valencia, CA, Representative, 11/2006 – Present

Designations:

- Registered Financial Consultant – RFC (Inactive Member)

The Registered Financial Consultant (RFC®) designation is a professional credential for persons in the field of financial planning. The designation is awarded by the International Association of Registered Financial Consultants (IARFC) to those financial advisors who can meet the high standards of education, experience and integrity that are required of all its members.

Candidates are required to complete a self-study process to attain the RFC designation. The preparation curriculum consists of ten volumes mirroring that of the CFP preparation, and covers the following six topics: financial planning process, insurance planning, retirement planning, investment planning, income tax planning and estate planning.

Designees must agree to devote a minimum of 40 hours per year to continuing professional education in the field of personal finance and professional practice management.

Item 3. Disciplinary Information

Mr. MacArthur does not have any history of disciplinary events.

Item 4. Other Business Activities

Mr. MacArthur is licensed to sell securities through Ausdal Financial Partners, Inc., a registered broker-dealer, member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and a registered investment adviser. In this capacity, Mr. MacArthur may receive commission-based compensation in connection with the purchase and sale of securities. Compensation earned by Mr. MacArthur in his capacity as a registered representative is separate and in addition to our advisory fees. This practice presents a conflict of interest because Mr. MacArthur has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs.

Mr. MacArthur holds a managing member title with Lovingfoss Capital Fund II, LLC (“LCF II”), an unregistered offering, exempt from SEC registration under Rule 506(b) of Regulation D. Mr. MacArthur also has an ownership interest in LCF II, and is compensated monetarily for his services to LCF II, which include both consulting work and business development efforts. Given this arrangement, there is a potential for a conflict of interest in recommending a client to purchase the investment. Therefore, LCF II is a prohibited investment for any current or future client of Criterion.

Mr. MacArthur holds a managing member title with EASI Investments LLC (“EASI”), an investments research and consulting company which does not offer advisory or brokerage services. Mr. MacArthur has an ownership interest in EASI, and may be compensated monetarily for management and business oversight. No products or compensation are currently available. Full disclosure will be made to clients and prospective clients upon commencement of services or investments where the potential for a conflict of interest exists.

As an independent contractor, Mr. MacArthur is the sole member and owner of M2 Financial LLC (“M2”), a California single-member LLC. M2 does not offer or function as a regulated investment company. Mr. MacArthur does not receive compensation from M2, outside of his affiliation to Criterion Capital Investments.

Item 5. Additional Compensation

Other than as noted in the above section Other Business Activities, Mr. MacArthur does not receive any additional compensation beyond the fee-based compensation he receives through Criterion Wealth Management.

Item 6. Supervision

Jason O. Stauffer, Partner and Chief Compliance Officer, is responsible for supervising Mr. MacArthur’s advisory activities. Mr. Stauffer can be reached at (661) 254-2543 or jason@criterionwealth.com. Mr. Stauffer, as the firm’s CCO, is responsible for the day-to-day compliance matters of the firm.

Part 2B of Form ADV: *Brochure Supplement*

Robert Allen Gravette



**Criterion Wealth Management Insurance Services, Inc.
dba: Criterion Wealth Management**

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March 31, 2017

This brochure supplement provides information about Robert Allen Gravette that supplements the Criterion Wealth Management brochure. A copy of that brochure was previously made available to you. Please contact Criterion Wealth Management if you'd like to request another copy of the brochure or if you have any questions about the contents of this supplement.

Additional information about Robert Allen Gravette is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Name: Robert Allen Gravette

Year of Birth: 1966

Education:

- Bachelor's Degree, The Master's University, Newhall, CA (1989)
- College for Financial Planning, Professional Education Program, Denver, Co (1998)

Business Background:

- Criterion Wealth Management, Valencia, CA, President, 10/2004 – Present
- Robert B. Ausdal & Co., Inc., Valencia, CA, Representative, 11/2006 – Present
- Signator Investors, Inc. Valencia, CA, Adviser Representative, 11/1990-2004

Designations:

- Registered Financial Consultant – RFC (2006)

The Registered Financial Consultant (RFC®) designation is a professional credential for persons in the field of financial planning. The designation is awarded by the International Association of Registered Financial Consultants (IARFC) to those financial advisors who can meet the high standards of education, experience and integrity that are required of all its members.

Candidates are required to complete a self-study process to attain the RFC designation. The preparation curriculum consists of ten volumes mirroring that of the CFP preparation, and covers the following six topics: financial planning process, insurance planning, retirement planning, investment planning, income tax planning and estate planning.

Designees must agree to devote a minimum of 40 hours per year to continuing professional education in the field of personal finance and professional practice management.

Item 3. Disciplinary Information

Mr. Gravette does not have any history of disciplinary events.

Item 4. Other Business Activities

Mr. Gravette is licensed as an insurance agent and may earn commission-based compensation for selling insurance products. Insurance commissions earned by Mr. Gravette are separate and in addition to our advisory fees. This practice presents a conflict of interest because Mr. Gravette has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Gravette.

Mr. Gravette is licensed to sell securities through Ausdal Financial Partners, Inc., a registered broker-dealer, member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and a registered investment adviser. In this capacity, Mr. Gravette will receive commission-based compensation in connection with the purchase and sale of securities. Compensation earned by Mr. Gravette in his capacity as a registered representative is separate and in addition to our advisory fees. This practice presents a conflict of interest because Mr. Gravette has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs.

Item 5. Additional Compensation

Other than as noted in the above section Other Business Activities, Mr. Gravette does not receive any additional compensation beyond the fee-based compensation he receives through Criterion Wealth Management.

Item 6. Supervision

Jason O. Stauffer, Partner and Chief Compliance Officer, is responsible for supervising Mr. Gravette's advisory activities. Mr. Stauffer can be reached at (661) 254-2543 or jason@criterionwealth.com. Mr. Stauffer, as the firm's CCO, is responsible for the day-to-day compliance matters of the firm.

Part 2B of Form ADV: *Brochure Supplement*

Zachary Paul Herbert



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March 31, 2017

This brochure supplement provides information about Zachary Paul Herbert that supplements the Criterion Wealth Management brochure. A copy of that brochure was previously made available to you. Please contact Criterion Wealth Management if you'd like to request another copy of the brochure or if you have any questions about the contents of this supplement.

Additional information about Zachary Paul Herbert is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Name: Zachary Paul Herbert

Year of Birth: 1982

Education:

- Bachelor's Degree, The Master's University, Newhall, CA (2004)

Business Background:

- Criterion Wealth Management, Valencia, CA, Chief Investment Officer, 09/2015 – Present
- Check Capital Management Inc., Costa Mesa, CA, VP, Senior Investment Officer, 01/2013 – 08/2015
- Trimsail Capital Management, Inc., Los Angeles, CA, Principal, 04/2011 – 12/2012
- Charles Schwab & Co., Inc., Los Angeles, CA, VP – Financial Consultant, 07/2006 – 03/2011

Designations:

- Chartered Financial Analyst – CFA (2013)

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 138,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards – *The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:*

- *Place their clients' interests ahead of their own*
- *Maintain independence and objectivity*
- *Act with integrity*
- *Maintain and improve their professional competence*
- *Disclose conflicts of interest and legal matters*

Global Recognition – *Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.*

Additionally, regulatory bodies in over 30 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge – *The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.*

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3. Disciplinary Information

Mr. Herbert does not have any history of disciplinary events.

Item 4. Other Business Activities

Mr. Herbert does not engage in any other investment-related business or occupation.

Item 5. Additional Compensation

Mr. Herbert does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate anyone for client referrals.

Item 6. Supervision

Jason O. Stauffer, Partner and Chief Compliance Officer, is responsible for supervising Mr. Herbert's advisory activities. Mr. Stauffer can be reached at (661) 254-2543 or jason@criterionwealth.com. Mr. Stauffer, as the firm's CCO, is responsible for the day-to-day compliance matters of the firm.

Part 2B of Form ADV: *Brochure Supplement*

Jason Owen Stauffer



**Criterion Wealth Management Insurance Services, Inc.
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March 31, 2017

This brochure supplement provides information about Jason Owen Stauffer that supplements the Criterion Wealth Management brochure. A copy of that brochure was previously made available to you. Please contact Criterion Wealth Management if you'd like to request another copy of the brochure or if you have any questions about the contents of this supplement.

Additional information about Jason Owen Stauffer is available of the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Name: Jason Owen Stauffer

Year of Birth: 1981

Education:

- Bachelor's Degree, The Master's University, Newhall, CA, Accounting (2004)

Business Background:

- Criterion Wealth Management, Valencia, CA, Director of Operations/Chief Compliance Officer, 10/01/2013 - Present
- Hedman Partners, Valencia, CA, Tax Manager, 01/2008 - 09/2013
- LHMP, Pasadena, CA, Tax Accountant, 01/2006 - 12/2007

Designations:

- Certified Public Accountant – CPA (2009)

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include:

- *minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting),*
- *minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and*
- *successful passage of the Uniform CPA Examination.*

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period).

Item 3. Disciplinary Information

Mr. Stauffer does not have any history of disciplinary events.

Item 4. Other Business Activities

Mr. Stauffer does not engage in any other investment-related business or occupation.

Item 5. Additional Compensation

Mr. Stauffer does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate anyone for client referrals.

Item 6. Supervision

Jason O. Stauffer, Partner and Chief Compliance Officer, is responsible for supervising all employees, including himself. Mr. Stauffer can be reached at (661) 254-2543 or jason@criterionwealth.com. Mr. Stauffer, as the firm's CCO, is responsible for the day-to-day compliance matters of the firm.