



## **Compton Financial Group, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: September 5, 2018**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Compton Financial Group, LLC (“CFG” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (410) 321-0168 or by email at [chris@comptonfinancial.com](mailto:chris@comptonfinancial.com).

CFG is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about CFG to assist you in determining whether to retain the Advisor.

Additional information about CFG and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or by our CRD# 166912.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of CFG. For convenience, we have combined these documents into a single disclose document.

CFG believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. CFG encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor may compensate a Solicitor for referring Clients. Please see Item 14B for additional information.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or by our CRD# 166912. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (410) 321-0168 or by email at [chris@comptonfinancial.com](mailto:chris@comptonfinancial.com).

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## Item 4 – Advisory Services

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### A. Firm Information

Compton Financial Group, LLC (“CFG” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). CFG is organized as a Limited Liability Company (“LLC”) under the laws of the State of Maryland. CFG was founded in January 2013, and is owned and operated by Christopher P. Compton (Managing Member and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by CFG.

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

### B. Advisory Services Offered

CFG offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and retirement plans in the State of Maryland and other states (each referred to as a “Client”).

#### Wealth Management Services

CFG may provide Clients with wealth management services, which generally includes a broad range of comprehensive financial planning and consulting services in connection with discretionary management of investment portfolios. These services are described below.

*Investment Management Services* - CFG provides investment advisory solutions for its Clients based on model portfolios created by the Advisor. The Advisor primarily utilizes exchange traded funds (“ETFs”) and mutual funds to create proprietary model portfolios offered to its Clients. The Advisor may also utilize other investments to meet the model objectives. CFG evaluates and selects investments for inclusion in model portfolios only after applying its internal due diligence process. The Advisor will work with the Client to identify their investment goals, objectives, and risk tolerance to construct a portfolio from the Advisor’s model portfolios. The Advisor may retain certain types of investments based on a Client’s legacy holdings, which will be maintained outside of the models.

CFG’s investment strategy[ies] is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. CFG will construct, implement and monitor the portfolios and allocate Client assets to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client.

CFG evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. CFG may, on occasion, redistribute investment allocations to diversify the portfolio. CFG may invest in specific positions to increase sector or asset class weightings. The Advisor may employ cash positions as a possible hedge against market movement. CFG may sell 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.

At no time will CFG accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client wealth management agreement. For additional information, please see Item 12 – Brokerage Practices and Item 15 – Custody.

*Use of Independent Managers* - CFG may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and

ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures).

*Financial Planning Services* - CFG will typically provide a variety of financial planning and consulting services to Clients on an initial and on an as needed basis, as a part of its wealth management services. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. The Advisor may also be engaged for financial planning services in a separate engagement.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, insurance needs, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

CFG may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction[s] through the Advisor.

#### Retirement Plan Advisory Services

CFG provides 3(21) retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Employee Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Oversight and Due Diligence
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Certain of these services are provided by CFG serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of CFG's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

### C. Client Account Management

Prior to engaging CFG to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – CFG, in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives based on the Client's financial situation, time horizon and tolerance for risk.
- Asset Allocation – CFG will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – CFG will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – CFG will provide investment management and ongoing oversight of the Client's investment portfolio.

### D. Wrap Fee Programs

CFG does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by CFG.

### E. Assets Under Management

As of December 31, 2017, CFG manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$168,926,008
Non-Discretionary Assets	196,238,191
<b>Total</b>	<b>\$365,164,199</b>

Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

### A. Fees for Advisory Services

#### Wealth Management Services

For Clients engaged for comprehensive wealth management services, the Client will be charged a single combined fee for investment management and financial planning services based on the market value of assets under management.

Wealth management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the wealth management agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees range up to 1.50% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

Fees may vary from the above fee depending on the nature and complexity of each Client's circumstances, or with the inclusion of a financial plan. An estimate for the total costs will be determined prior to establishing the advisory relationship.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by CFG will be independently valued by the designated Custodian. CFG will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Financial Planning Services

CFG may also be engaged for financial planning services as a separate engagement. Financial planning services are offered on either an hourly basis or for a fixed fee per engagement. Hourly engagements are at a rate of \$150 to \$500 per hour. Fixed fee engagements range from \$1,500 to \$15,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and total costs will be provided to the Client prior to engaging for these services.

#### Retirement Plan Advisory Services Fees

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.00%. Retirement plan advisory fees are payable quarterly, in advance of each calendar quarter. Retirement Plan Advisory Services Fees are negotiable with the plan sponsor.

#### Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee may be separately billed or deducted from the Client's account[s] by the Independent Manager.

### **B. Fee Billing**

#### Wealth Management Services

Investment advisory fees are calculated and deducted from the Client's account[s] by the Custodian. The Client or its delegate shall instruct the Custodian to automatically deduct the investment advisory fee from the Client's account[s] for each billing period and pay the investment advisory fee[s] to the Advisor. The Custodian will utilize the fee rate, as defined in an agreement, to indicate the fee to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with CFG at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting CFG to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

#### Financial Planning Services

Financial planning fees may be charged up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be due upon completion of the agreed upon deliverable[s].

#### Retirement Plan Advisory Services Fees

CFG is compensated for its services at the end of the quarter after advisory services are rendered. Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

#### Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee will be deducted from the Client's account[s] with the respective manager and a portion of the wealth management fee may be provided to CFG.



### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than CFG, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian and executing broker-dealer. The fees charged by CFG are separate and distinct from these custody and execution fees.

In addition, all fees paid to CFG for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of CFG, but would not receive the services provided by CFG which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by CFG to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

### **D. Advance Payment of Fees and Termination**

#### Wealth Management Services

CFG is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance notice to the other party. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### Financial Planning Services

CFG may require an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance notice to the other party. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engage, the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior approval.

#### Retirement Plan Advisory Services Fees

Either party may request to terminate their services with CFG in whole or in part, by providing advance notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's written approval.

#### Use of Independent Managers

In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. CFG will assist the Client with the termination and transition as appropriate.

### **E. Compensation for Sales of Securities**

Advisory Persons of CFG are also registered representatives of LPL Financial LLC ("LPL Financial"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In one's separate capacity as a registered representative of LPL Financial, an Advisory Person may implement securities transactions under LPL Financial and not through CFG. In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to CFG's advisory fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives have an



incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. CFG mitigates this conflict in two ways. First, Clients always have the right to choose whether or not to purchase securities products through one of our Advisory Persons. Second, CFG will not charge an ongoing investment advisory fee on any assets implemented in the separate capacity of one of our Advisory Persons. Please see Item 10.

Certain Advisory Persons are also licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because Advisory Persons who are also insurance agents may have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on a Client's needs. However, to mitigate this conflict, Clients always have the right to choose whether or not to purchase insurance products through any person affiliated with our CFG.

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## **Item 6 – Performance-Based Fees and Side-By-Side Management**

CFG does not charge performance-based fees for its wealth management services. The fees charged by CFG are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

CFG does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

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## **Item 7 – Types of Clients**

CFG offers wealth management services to individuals, high net worth individuals, trusts, estates and retirement plans. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. CFG generally does not impose a minimum size for establishing a relationship.

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

### **A. Methods of Analysis**

CFG primarily employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from CFG is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that CFG will be able to accurately predict such a reoccurrence.

As noted above, CFG generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. CFG will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, CFG may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. CFG will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the potential speculative components of the Advisor's strategy:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The value of the ETFs will fluctuate with the value of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low volume. Authorized participants in an ETF may change at any time; this may result in change to the liquidity and the ability to redeem the ETF as the authorized participants control the number of shares of the ETF. The value of an ETF fluctuates based upon the market movements and may disassociate from the index being tracked or from the value of the underlying investments. An ETF purchased or sold at one point in the day may have a different value than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The value of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The value of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same value as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving CFG or any of its management persons.** CFG values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or our CRD# 166912.

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

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### Broker-Dealer Affiliation

As mentioned in Item 5.E above, certain Advisory Persons are also a registered representative of LPL Financial. In their separate capacity as registered representatives, Advisory Persons will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity as a registered representative.

### Insurance Agency Affiliations

As noted in Item 5 above, certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with CFG. As an insurance professional, the Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

### Compton Retirement Plan Services

Christopher Compton is the owner of Compton Retirement Plan Services, a Third Party Administrator (TPA) which is involved in the administration of retirement plans for plan sponsors. Mr. Compton may offer the services of the TPA to its Clients. Mr. Compton may receive additional compensation for Clients who engage this TPA and Mr. Compton in his separate capacity. This may cause a conflict of interest in recommending the TPA to clients. Clients are under no obligation to engage the services of the TPA or Mr. Compton in his separate capacity.

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

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### **A. Code of Ethics**

CFG has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with CFG (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. CFG and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of CFG's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (410) 321-0168 or via email at [chris@comptonfinancial.com](mailto:chris@comptonfinancial.com).

### **B. Personal Trading with Material Interest**

CFG allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. CFG does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. CFG does not have a material interest in any securities traded in Client accounts.

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<http://comptonfinancial.com>

### C. Personal Trading in Same Securities as Clients

CFG allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by CFG requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

### D. Personal Trading at Same Time as Client

While CFG allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will CFG, or any Supervised Person of CFG, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

CFG does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize CFG to direct trades to the Custodian as agreed in the investment advisory agreement. Further, CFG does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where CFG does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. As its Advisory Persons are also registered representatives of LPL Financial, CFG and its Advisory Persons are limited in the Custodian[s] in which they can recommend to Clients. Typically, CFG will recommend that Clients establish their accounts at LPL Financial, where CFG has access to LPL Financial's systems, back office support, research and other benefits. While CFG receives these economic benefits from LPL Financial, we believe LPL Financial provides quality execution and related services for our Clients at competitive prices. Price is not the sole factor CFG considers in evaluating best execution and the recommendation of the Custodian. CFG also considers the quality of the brokerage services provided by LPL Financial, including the firm's reputation, execution capabilities, commission rates, and responsiveness to our Clients and our firm. Clients are free to use whatever broker-dealer/custodian they choose to implement financial planning recommendations. For investment advisory services, CFG would be required to obtain permission to use a broker-dealer or custodian other than LPL Financial due to the oversight role LPL Financial assumes over the Advisory Persons. Please see Item 14.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodian whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. CFG does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from LPL Financial. Please see Item 14.

**2. Brokerage Referrals** - CFG does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a “directed brokerage basis”, where CFG will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). In selecting the Custodian, CFG will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. CFG will execute its transactions through an unaffiliated broker-dealer selected by the Client. CFG may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Christopher Compton and Robert Compton. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account. The Client is encouraged to notify CFG if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by CFG**

#### Participation in Institutional Advisor Platform

CFG has established institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor’s recommendation of the Custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from LPL Financial: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate

securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### **B. Client Referrals from Solicitors**

CFG may engage and compensate unaffiliated third party referral sources (a "solicitor") for Client referrals. Clients will not pay a higher fee to CFG as a result of such payments to a solicitor. The Advisor shall enter into an agreement with the solicitor, which requires that full disclosure of the compensation and other conflicts is provided to the prospective client prior to or at the time of entering into the advisory agreement.

#### **Item 15 – Custody**

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CFG does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a qualified Custodian. Clients are required to engage the Custodian to retain their funds and securities and direct CFG to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by CFG to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

#### **Item 16 – Investment Discretion**

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CFG 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. 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 CFG. Discretionary authority will only be authorized 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 CFG will be in accordance with each Client's investment objectives and goals.

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

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CFG does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

#### **Item 18 – Financial Information**

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Neither CFG, nor its management, have any adverse financial situations that would reasonably impair the ability of CFG to meet all obligations to its Clients. Neither CFG, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. CFG is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Christopher P. Compton, CFP®, ChFC®  
Managing Partner, Chief Advisor and Chief Compliance Officer**

**Effective: September 5, 2018**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Christopher P. Compton, CFP®, ChFC® (CRD# 2946906) in addition to the information contained in the Compton Financial Group, LLC ("CFG" or the "Advisor", CRD# 166912) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CFG Disclosure Brochure or this Brochure Supplement, please contact us at (410) 321-0168 or by email at [chris@comptonfinancial.com](mailto:chris@comptonfinancial.com).

Additional information about Mr. Compton is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2946906.



## Item 2 – Educational Background and Business Experience

Christopher P. Compton, CFP®, ChFC®, born in 1975, is a Managing Partner & Chief Advisor for CFG. Mr. Compton also earned a Bachelor of Science, Finance Concentration from the University of Richmond in 1997. Additional information regarding Mr. Compton's employment history is included below.

### Employment History:

Managing Partner, Chief Advisor and Chief Compliance Officer, Compton Financial Group, LLC	02/2013 to Present
Registered Representative, LPL Financial LLC	06/2005 to Present
Principal, R.L. Compton & Associates	01/1997 to Present
Investment Advisor Representative, LPL Financial LLC	06/2005 to 11/2015
Investment Advisor Representative and Registered Representative, Lincoln Financial Advisors Corporation	09/1997 to 06/2005
Insurance Agent and Registered Representative, The Lincoln National Life Insurance Company	09/1997 to 06/2005

### Certified Financial Planner™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Chartered Financial Consultant® (ChFC®)**

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

#### **Program Objectives**

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

### **Item 3 – Disciplinary Information**

***There are no legal, civil or disciplinary events to disclose regarding Mr. Compton.*** Mr. Compton has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Compton.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Compton.***

However, we do encourage you to independently view the background of Mr. Compton on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2946906.

### **Item 4 – Other Business Activities**

#### **Broker-Dealer Affiliation**

Mr. Compton is also a registered representative of LPL Financial LLC ("LPL Financial"). LPL Financial is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Compton's separate capacity as a registered representative, Mr. Compton will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Compton. Neither the Advisor nor Mr. Compton will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Compton's separate capacity as a registered representative.

#### **Insurance Agency Affiliation**

Mr. Compton is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Compton's role with CFG. As an insurance professional, Mr. Compton may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Compton is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in

recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Compton or the Advisor.

R.L. Compton & Associates, Inc.

Mr. Compton is also the Principal of R.L. Compton & Associates, Inc., a third-party administrator ("TPA"). Mr. Compton designs and administers qualified retirement plans for his clients at R.L. Compton. Mr. Compton may receive additional compensation for Clients who engage this TPA and Mr. Compton in his separate capacity. This may cause a conflict of interest in recommending the TPA to clients. Clients are under no obligation to engage the services of the TPA or Mr. Compton in his separate capacity.

Real Estate

Mr. Compton also owns and manages a commercial rental property. Mr. Compton does not offer the rental property to any of his clients. Mr. Compton spends less than 5% of his time managing the property.

**Item 5 – Additional Compensation**

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Mr. Compton has additional business activities that are detailed in Item 4 above.

**Item 6 – Supervision**

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Mr. Compton serves as a Managing Partner, Chief Advisor and Chief Compliance Officer of CFG. Mr. Compton can be reached at (410) 321-0168.

CFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of CFG. Further, CFG is subject to regulatory oversight by various agencies. These agencies require registration by CFG and its Supervised Persons. As a registered entity, CFG is subject to examinations by regulators, which may be announced or unannounced. CFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Carli E. Converse, CFP®  
Investment Advisor Representative**

**Effective: September 5, 2018**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Carli E. Converse, CFP® (CRD# 6326588) in addition to the information contained in the Compton Financial Group, LLC (“CFG” or the “Advisor”, CRD# 166912) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CFG Disclosure Brochure or this Brochure Supplement, please contact us at (410) 321-0168 or by email at [chris@comptonfinancial.com](mailto:chris@comptonfinancial.com).

Additional information about Ms. Converse is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 6326588.

## Item 2 – Educational Background and Business Experience

Carli E. Converse, CFP®, born in 1993, is an Investment Advisor Representative for CFG. Ms. Converse earned a Bachelor of Science in Finance from the University of Delaware in 2015. Additional information regarding Ms. Converse's employment history is included below.

### Employment History:

Investment Advisor Representative, Compton Financial Group, LLC	08/2015 to Present
Registered Representative, LPL Financial LLC	05/2015 to Present
Cashier, The Delaware Growler	10/2014 to 05/2015

### Certified Financial Planner™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Ms. Converse.*** Ms. Converse has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Converse.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Converse.***

However, we do encourage you to independently view the background of Ms. Converse on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 6326588.

### Item 4 – Other Business Activities

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#### Broker-Dealer Affiliation

Ms. Converse is also a registered representative of LPL Financial LLC (“LPL Financial”). LPL Financial is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Ms. Converse’s separate capacity as a registered representative, Ms. Converse will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Converse. Neither the Advisor nor Ms. Converse will earn ongoing investment advisory fees in connection with any products or services implemented in Ms. Converse’s separate capacity as a registered representative.

#### Notary Public

Ms. Converse is also a Notary Public in the state of Maryland. Ms. Converse spends approximately an hour per month at this business activity.

### Item 5 – Additional Compensation

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Ms. Converse has additional business activities that are detailed in Item 4 above.

### Item 6 – Supervision

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Ms. Converse serves as an Investment Advisor Representative of CFG and is supervised by Christopher Compton, the Chief Compliance Officer. Mr. Compton can be reached at (410) 321-0168.

CFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of CFG. Further, CFG is subject to regulatory oversight by various agencies. These agencies require registration by CFG and its Supervised Persons. As a registered entity, CFG is subject to examinations by regulators, which may be announced or unannounced. CFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Robert L. Compton, Jr.**  
**Investment Advisor Representative**

**Effective: September 5, 2018**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Robert L. Compton (CRD# 860283) in addition to the information contained in the Compton Financial Group, LLC ("CFG" or the "Advisor", CRD# 166912) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CFG Disclosure Brochure or this Brochure Supplement, please contact us at (410) 321-0168 or by email at [chris@comptonfinancial.com](mailto:chris@comptonfinancial.com).

Additional information about Mr. Compton is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 860283.



## Item 2 – Educational Background and Business Experience

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Robert L. Compton, born in 1946, advises Clients of CFG as an Investment Advisor Representative. Mr. Compton earned a Bachelor of Arts from Ursinus College in 1968. Mr. Compton also earned a Masters of Business Administration from Rider College in 1974. Additional information regarding Mr. Compton's employment history is included below.

### Employment History:

Investment Advisor Representative, Compton Financial Group, LLC	06/2006 to Present
Registered Representative, LPL Financial LLC	06/2005 to Present
Registered Representative, Lincoln Financial Advisors Corporation	08/1993 to 06/2005
Insurance Agent and Registered Representative, The Lincoln National Life Insurance Company	12/1978 to 06/2005

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Compton.*** Mr. Compton has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Compton.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Compton.***

However, we do encourage you to independently view the background of Mr. Compton on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 860283.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Compton is also a registered representative of LPL Financial LLC ("LPL Financial"). LPL Financial is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Compton's separate capacity as a registered representative, Mr. Compton will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Compton. Neither the Advisor nor Mr. Compton will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Compton's separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Compton is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Compton's role with CFG. As an insurance professional, Mr. Compton may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Compton is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Compton or the Advisor.

### R.L. Compton & Associates, Inc.

Mr. Compton is also a member of R.L. Compton & Associates, Inc., a third-party administrator ("TPA"). Mr. Compton designs and administrates qualified retirement plans for the clients at R.L. Compton. Mr. Compton receives additional compensation for this activity, but does not receive any additional compensation for client

referrals. Clients are under no obligation to engage the services of the TPA or Mr. Compton in his separate capacity.

#### Board Member

Mr. Compton is a board member of a bank and is compensated in this role. Mr. Compton spends less than 10% of his time in this role and no clients are referred or engaged with this company.

### **Item 5 – Additional Compensation**

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Mr. Compton has additional business activities that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Compton serves as an Investment Advisor Representative of CFG and is supervised by Christopher Compton, the Chief Compliance Officer. Christopher Compton can be reached at (410) 321-0168.

CFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of CFG. Further, CFG is subject to regulatory oversight by various agencies. These agencies require registration by CFG and its Supervised Persons. As a registered entity, CFG is subject to examinations by regulators, which may be announced or unannounced. CFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Aaron A. Tyburski**  
**Investment Advisor Representative**

**Effective: September 5, 2018**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Aaron A. Tyburski (CRD# 6534134) in addition to the information contained in the Compton Financial Group, LLC ("CFG" or the "Advisor", CRD# 166912) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CFG Disclosure Brochure or this Brochure Supplement, please contact us at (410) 321-0168 or by email at [chris@comptonfinancial.com](mailto:chris@comptonfinancial.com).

Additional information about Mr. Tyburski is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6534134.

## Item 2 – Educational Background and Business Experience

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Aaron A. Tyburski, born in 1992, is an Investment Advisor Representative for CFG. Mr. Tyburski also earned a Business Administration from the University at Albany (SUNY) in 2015. Additional information regarding Mr. Tyburski's employment history is included below.

### Employment History:

Investment Advisor Representative, Compton Financial Group, LLC	07/2018 to Present
Registered Representative, LPL Financial LLC	07/2018 to Present
Senior Administrator, AYCO - a Goldman Sachs Company	01/2017 to 07/2018
Financial Analyst, Latham Pool Products, Inc.	11/2015 to 12/2017
Registered Representative, Foresters Financial Services, Inc.	08/2015 to 10/2015
Event Coordinator, Brooklyn Brewery	06/2015 to 08/2015
Sales Manager in Training, Scotts Miracle Gro	01/2015 to 05/2015
Server, Darden Inc (Olive Garden)	06/2014 to 12/2014
Sales Associate, Lens Crafters	08/2013 to 05/2014

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Tyburski.*** Mr. Tyburski has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Tyburski.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Tyburski.***

However, we do encourage you to independently view the background of Mr. Tyburski on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6534134.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Tyburski is also a registered representative of LPL Financial LLC ("LPL Financial"). LPL Financial is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Tyburski's separate capacity as a registered representative, Mr. Tyburski will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Tyburski. Neither the Advisor nor Mr. Tyburski will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Tyburski's separate capacity as a registered representative.

## Item 5 – Additional Compensation

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Mr. Tyburski has additional business activities that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Tyburski serves as an Investment Advisor Representative of CFG and is supervised by Christopher Compton, the Chief Compliance Officer. Mr. Compton can be reached at (410) 321-0168.

CFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of CFG. Further, CFG is subject to regulatory oversight by various

agencies. These agencies require registration by CFG and its Supervised Persons. As a registered entity, CFG is subject to examinations by regulators, which may be announced or unannounced. CFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: September 5, 2018

### Our Commitment to You

Compton Financial Group, LLC ("CFG" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. CFG (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

CFG does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> CFG does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where CFG or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> CFG does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (410) 321-0168 or via email at [chris@comptonfinancial.com](mailto:chris@comptonfinancial.com).