

Cover Page

Firm Brochure

August 30, 2018

ITEM 1 – DISCLAIMER

This Brochure provides information about the qualifications and business practices of CommunityAmerica Financial Solutions, LLC (“CAFS”). If you have any questions about the contents of this Brochure, please contact the CAFS Compliance Department at 913.905.3600. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

CAFS is a registered investment advisor with the SEC. Registration of an investment advisor does not imply any level of skill or training. Additional information about CAFS is also available on the SEC’s website at www.advisorinfo.sec.gov.

Non-Deposit Investment Products offered through CAFS are not federally insured, are not guaranteed by or obligations of CAFS and may involve investment risk including possible loss of principal.

ITEM 2 – MATERIAL CHANGES

CAFS is required to discuss only material changes that have occurred since the last annual Brochure update. Our Brochure was last updated March 31, 2015. Material changes to our Brochure are summarized below:

Item 4 – We added a discussion about the difference between investment advisor and brokerage products and services and fees. We also added a discussion of important factors to consider before deciding to invest with a TPMA Manager. We added a discussion of our new Asset Allocation Model Portfolios (AAMP) program.

Item 5 – We increased the maximum Financial Planning to \$5000. We added a discussion of the AAMP program.

Item 8 – We added a discussion of the new AAMP program.

Item 12 – We added a discussion of the new AAMP program.

Item 13 – We added a discussion of the new AAMP program.

Item 15 – We added a discussion of our two Clearing Firms.

Item 16 – We added a discussion of our new AAMP program regarding the use of discretion.

Item 17 – We added language that we do not vote client proxies in either the TPMA or AAMP programs.

Item 19 – We changed this discussion to reflect that this item no longer applies to us as we are now a federally registered investment advisor.

ITEM 3 – TABLE OF CONTENTS

Item 1 – Disclaimer	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Business.....	4
Item 5 – Fees and Compensation.....	9
Item 6 – Performance-Based Fees.....	10
Item 7 – Types of Clients	10
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Item 9 – Disciplinary Information.....	12
Item 10 – Other Financial Industry Activities and Affiliations.....	13
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	13
Item 12 – Brokerage Practices.....	13
Item 13 – Review of Accounts.....	14
Item 14 – Client Referrals and Other Compensation.....	14
Item 15 – Custody	15
Item 16 – Investment Discretion.....	15
Item 17 – Voting Client Securities.....	16
Item 18 – Financial Information.....	16

ITEM 4 – ADVISORY BUSINESS

CommunityAmerica Financial Solutions, LLC (we or us) is a broker-dealer registered with the SEC and a member of FINRA and a federally registered investment adviser. We provide financial planning and investment advisory services through individuals registered with us as Investment Advisor Representatives ("Advisor") consistent with your unique financial situation, tax status and risk/reward objectives. We offer the following advisory programs: Financial Planning, referral to various Managers and recommendations of model portfolios designed by Morningstar.

CommunityAmerica Financial Solutions, LLC is a Missouri limited liability company and is a wholly owned subsidiary of CommunityAmerica CUSO One, LLC. CommunityAmerica CUSO One, LLC is wholly owned by CommunityAmerica Credit Union, a privately-held organization.

WORKING WITH YOUR ADVISOR

Your Advisor can offer both investment advisory services and products and brokerage services and products. There are important considerations when selecting the services and products best suited to your investment needs and goals.

Advisory Relationship – As a federally registered investment advisor, we and our Advisors are fiduciaries to you. This means that we and your Advisor must act while providing investment advisory services and products solely in your best interest. Generally, fees we charge for investment advisory services and products are either hourly or asset based.

Brokerage Relationship – As a broker-dealer, we and our Advisors must ensure that the brokerage products and services we offer are suitable for you based on your stated investment objectives, risk tolerance, tax status and other personal financial information you provide, which implies a responsibility to deal fairly with our clients in connection with the recommendation, purchase and sale of brokerage products we offer. Generally, you will pay commissions to purchase and sell brokerage products.

Factors to Consider When Deciding Between Investment Advisory and Brokerage Relationship:

Advisory Relationship

- Prefer ongoing fee payment based on assets under management rather than number of transactions
- Seek ongoing, holistic investment advice and management
- Seek a fiduciary relationship with an Advisor who must act in your best interest
- Seek an investment strategy that involves limited trading activity

Brokerage Relationship

- Prefer Commission based compensation only on transactions you direct
- Seek advice only on individual transactions
- Seek a suitability relationship with an Advisor who must deal fairly with you
- Seek primarily an investment strategy that involves ongoing purchases and sales of investment products

FINANCIAL PLANNING SERVICES

We, through our Advisors, provide financial plans and investment advice consistent with your financial status, investment objectives and tax status.

Financial planning is an interactive and collaborative process intended to assist you in accomplishing one or more financial or personal goals. Together, you and your Advisor will work through the financial planning process elements described below to develop a financial plan specific to your needs and goals:

- Initial Engagement: Discuss your specific financial and personal goals and concerns
- Gather Data: Discuss your current financial situation in more detail. This will entail the collection from you of various documents such as bank and brokerage account statements, tax returns, estate planning documents and insurance policies. We will rely on you to provide accurate and complete information.
- Analyze Data: We will evaluate and analyze your current financial needs and goals based on the data and documents you provide and we will use this analysis to develop a set of recommendations intended to lead to successful attainment of your financial and personal goals
- Recommendations: We will deliver a written financial plan that will provide recommendations based on our analysis of your data and documents.

Your financial plan will address one or more of the following goals:

- Retirement: Analyze projected retirement income and expenses based on defined retirement goals you provide. The analysis may suggest potential retirement shortfalls or surpluses which we will address with strategies to meet your retirement capital and income needs
- Education Funding: Analyze educational planning goals for specific periods. This analysis may outline potential gaps in your current education funding and provide strategies to eliminate the gaps
- Goal Funding: Analyze your specific personal goals for retirement and provide strategies to fund your goals
- Survivor Income Needs: Analyze the potential financial impact of an untimely death of a spouse based on defined financial goals. This analysis will provide strategies to help meet survivor income goals
- Disability Income: Analyze the potential impact of an unplanned disability on financial needs. This analysis will provide strategies to help meet necessary income requirements
- Long-Term Care: Analyze the potential impact of long-term care expenses on your overall financial goals. This analysis will provide risk strategies for ensuring sufficient benefits to cover long-term care financial obligations
- Estate Planning: Analyze your current estate and the facts of implementing various estate planning techniques and strategies such as wills, revocable trusts, irrevocable trusts and gifting programs
- Asset Allocation: Analyze basic asset allocation strategies for specific financial goals based on individual time horizons and risk tolerance levels
- Business Planning: Analyze the issues related to business continuity planning and the potential impacts they have on personal financial goals
- Income Tax Planning: Analyze the estimated impact taxes may have on your income, assets and financial goal, including the tax implications of various investment products and strategies

We are not licensed to engage in the practice of law or accounting and, consequently, will not offer legal or accounting advice when preparing the personal financial plan or providing financial advice. None of the fees for services under this program relate to legal or accounting services. If you need legal or accounting services are necessary, it shall be your responsibility to obtain them.

We have a conflict of interest in connection with recommending our financial planning services as there is an incentive for us to recommend products or services for which we or your Advisor may receive compensation. However, you are under no obligation to act upon any financial planning recommendations or to implement any financial planning recommendations through us or your Advisor.

THIRD PARTY MANAGED ACCOUNTS (TPMA)

Our TPMA program provides access to various unaffiliated third party style managers (Manager or Managers). We decide which Managers to include in TPMA and whether to remove and replace a manager based on a number of factors, including client needs, investment styles available in the marketplace, platform capacity, client demand and composite performance. As part of its ongoing Manager due diligence process, CAFS will, among other things, ensure that every Manager is properly licensed and registered as an investment adviser.

NOTE: Our due diligence review of Managers does not substitute for your ongoing monitoring of your TPMA account(s) and performance.

We will act as a solicitor for the Managers we include in TPMA. Each solicitor arrangement with Managers will be conducted pursuant to a written solicitor agreement between us and the Manager that is consistent with SEC Rule 206(4)-3. Your Advisor will refer Managers that they believe best meet your stated investment objectives, goals and risk tolerance.

If you select one Manager to exclusively manage all of your assets in your advisory account, it is understood that TPMA is not an asset allocation program but is an undiversified portfolio that is a portion of your overall investment objective; and that you have other assets either with CAFS or another financial services firm which, when combined, meet your overall investment objective.

You grant the Manager(s) you select discretionary authority to manage the individual securities in your TPMA account(s) (Underlying Investments). As such, all buy and sell decisions will be made by the Manager without consulting you in advance. The Manager also has authority to select broker-dealers or other qualified custodians to custody your account and to execute transactions. Managers may use our Clearing Firms (as discussed in Item 15 below) to custody the Underlying Investments in your TPMA account(s) and execute transactions for your account(s) or may choose another broker-dealer in their sole discretion. You should contact the Manager(s) you select to determine what types of investment restrictions you may impose on your TPMA account. Please consult each Manager's brochure for more information about their investment strategies/styles, fees, trading costs, best execution, investment risks, disciplinary information, error correction, trade aggregation and bunching, step out trading practices, program and account costs, etc. The Manager will provide their brochure at the time of, or prior to, TPMA account opening, which should be in a similar format to the CAFS Brochure you are reading now.

List of Managers

The following is a list of currently approved Managers currently available through TPMA:

- Brinker Capital
- Clark Capital
- Asset Mark
- Loring Ward
- Morningstar
- SEI

Below is a list of important features of TPMA that you should consider before selecting a Manager:

- You receive a solicitor disclosure from your Advisor for each Manager that discloses certain information about the Manager and the fees we will receive from the Manager for your referral
- You will receive a brochure similar to this Brochure from your Manager(s) at the time or prior to the time you establish a TPMA account with the Manager(s)
- You will enter into a client agreement with the Manager(s) you select that, among other things, grants discretionary authority to the Manager to execute securities transactions without consulting you in advance and describes the Manager's fees and costs
- Your Manager(s) will select one or more broker-dealers to custody your assets and execute your securities transactions
- Your Manager(s) will charge a fee for their services which will be deducted from your TPMA account
- Your Manager(s) is responsible for selecting investment styles and individual securities
- You must contact your Manager(s) to ascertain what types of restrictions you may request for your account
- We will, upon request from your Manager(s), provide certain information about you to your Manager(s)
- Your Advisor will answer general questions about your Manager(s).

Nevertheless, you have a contractual relationship with your Manager(s) and should contact your Manager(s) directly to:

- Discuss your account(s) and investment performance
- Review your Manager's investment philosophy and investment style to determine the ongoing compatibility of your Manager(s) to your investment objectives, financial goals, tax considerations and risk tolerance
- Request information regarding conflicts of interest between you and your Manager(s)
- Discuss questions about your Manager's Form ADV and Brochure
- Discuss any reasonable restrictions you may decide to place on your Portfolio investments
- Discuss your Manager's fees and costs
- Discuss your Managers proxy voting policies
- Discuss the nature and frequency of reports your Manager will provide

You assume responsibility for monitoring your Manager's investment practices and performance. We will not:

- Make any representation concerning your manager's qualifications or investment

- acumen
- Bear responsibility for the services rendered, information provided by, or for any recommendations made by your Manager(s)
- Endorse, recommend, or otherwise suggest that your Manager(s) will make suitable investment decisions
- Undertake to investigate or monitor the appropriateness of your Manager's investment style, investment decisions, best execution, or selection of broker-dealers

NOTE: The ultimate decision to participate in TPMA and the selection of your Manager(s) is your responsibility.

ASSET ALLOCATION MODEL PORTFOLIOS (AAMP)

AAMP is an asset allocation program that offers a selection of strategic asset allocation models from which to choose. AAMP currently consists of four models: Mutual Fund, Mutual Fund-Active/Passive, ETF and Select Equity (collectively Portfolios). Certain Portfolios will include tax sensitive investments.

We will retain from time to time investment strategists (Strategists) to create the Portfolios. Strategists are solely responsible for selecting the Underlying Investments for each Portfolio. Strategists will provide ongoing monitoring of the Portfolios and the Underlying Investments included in the Portfolios. Strategists will communicate any changes in Portfolio allocations to us. This is done to ensure that each Underlying Investment selected for a Portfolio has an investment objective that remains consistent with the assigned asset allocation within each Portfolio to which it is allocated. This process will result in periodic changes to the Portfolios and Underlying Investments.

We will pay the Strategists an ongoing fee to compensate them for, among other things, constructing the Portfolios, selecting the Underlying Investments that populate each Portfolio, ongoing monitoring of the Portfolios and communication with us regarding changes in allocations to the Underlying Investments.

You will complete a client agreement and investment proposal (IP) to establish an AAMP account. This process will determine, among other things, your investment objectives, risk tolerance and time horizon. Using the data from your IP and your client agreement, you and our Advisor will select one or more Portfolios. You may select either a discretionary or non-discretionary AAMP account. If you select a discretionary AAMP account, you will grant discretionary authority to your Advisor to enable them to purchase and sell Underlying Investments without consulting you in advance.

From time to time Strategists will make changes to the Underlying Investments that cause the Portfolio to deviate or drift from its original target allocation. This may also occur as a result of market action. We will analyze the Strategists' recommendations and determine whether or not rebalancing of your account is appropriate. You will give your advisor discretion to rebalance you Portfolio(s) at any time to return it to its original or new model allocation and to buy and sell Underlying Investments to implement any changes made by Strategists, as communicated by Strategists from time to time. Additions to or withdrawals from a Portfolio may also lead to rebalancing. Frequent withdrawals may have an adverse impact on achieving your investment goals and objectives. Rebalancing may cause an adverse taxable event.

You may fund your AAMP account with cash or securities acceptable to us in our sole discretion. Securities will likely be sold to purchase Underlying Investments. This may cause a

taxable event. If your account is funded by a transfer of an account from another financial institution, there may be a period during the transfer process that your transferring account is not invested in the market.

You may not impose investment restrictions on you AAMP account(s).

Note: Failure to fund an AAMP account within 60 days of executing a client agreement may result in the termination by us of your client agreement and the closure of your AAMP account(s).

ITEM 5 – FEES AND COMPENSATION

FINANCIAL PLANNING FEES

The fee for each financial plan created by your Advisor will be determined at the rate of \$250 per hour, with a maximum fee of \$5000 for each financial plan. Should there be a subsequent or new plan, the fees will restart.

Before commencing the financial planning process you and your Advisor will meet to discuss, among other things, the complexity of your financial situation, your specific personal and investment objectives, needs, risk tolerance, the investment products and services we offer, the time it will take to review the background materials your Advisor will obtain from you, the time that will be spent interacting with your other professional advisors and the frequency of meetings and contacts you will have with your Advisor to ensure we serve your investment needs. You and your Advisor will then negotiate a fee for your financial plan based on the above factors. In certain limited situations we may consider preparing a financial plan for a flat fee.

TPMA FEES

Each Manager in the TPMA program has its own brochure that describes all of the Manager's fees and billing policies. Please refer to the Manager's brochure for specific information about each Manager. The maximum annual fee on any TPMA account is 3.0% of assets under management. All Managers will pay a portion of their fee collected from your TPMA account(s) to CAFS as compensation for its role as a solicitor.

In general, advisory fees are established in the written advisory agreement between you and the Manager(s). You may also incur certain charges imposed by our Clearing Firms and the TPMA qualified custodians, and other third parties such as custodial fees, odd-lot differentials, transfer taxes, retirement account maintenance and termination fees, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions that may be required by law. These fees are exclusive of and in addition to the advisory fees charged by the Manager. CAFS will not receive any portion of these fees.

In addition to the advisory fees described above, you will also incur certain fees charged by mutual fund companies and exchange-traded funds which are disclosed in the applicable prospectus. Examples of these fees include deferred sales charges, administrative expenses, internal management fees and other service fees. For more information about these fees please read the summary or full prospectus for each mutual fund and the disclosure document for ETFs. CAFS and your Advisor may receive a portion of these fees.

In most cases, your TPMA account will be maintained with the custodian utilized by the Manager. If the Manager does not mandate the use of a specific custodian, CAFS will recommend that you establish your TPMA account with one of its Clearing Firms (described in Section 15 below). If one of our Clearing Firms is the custodian of your TPMA account(s), CAFS may receive a portion of the following service fees, as applicable: outgoing transfers, wired funds, inactive accounts, stop payments, direct registration of securities, margin extensions, ticket charges, retirement account maintenance and termination fees, as well as asset-based fees on money market positions, uninvested cash balances, margin balances and cash sweeps to bank accounts. Your Advisor does not receive a portion of these fees.

AAMP FEES

AAMP fees are negotiable with a maximum annual fee of 2.5% of assets under management in your AAMP account. The fees you pay will include clearing and custody costs for AAMP accounts. AAMP fees will be assessed to cash balances held in AAMP accounts from time to time. Account balances in multiple AAMP accounts will be aggregated for purposes of negotiating the applicable advisory fee rate. Householding is automatic and is triggered by accounts which share the same financial advisor ID, client last name and same physical address.

TPMA and AAMP fees and costs vary across both programs as described above. You may be able to obtain similar advisory services and Underlying Investments separately for a lower fee through a brokerage account or an advisory account with another investment advisor. Several factors determine whether it will cost more or less to participate in one of our TPMA or AAMP accounts or another brokerage or investment advisory account where you purchase advice and Underlying Investments separately, including size of your account, the types of Underlying Investments in which you invest, the level of trading activity in your account and whether the Underlying Investments involve internal or other expenses in addition to an investment advisory fee. You should consider these and other differences when deciding whether to invest through an investment advisory or in a brokerage account. Nevertheless, cost is only one factor in determining which type of investment account is most appropriate. You should also consider your ability to access investment managers and Underlying Investments that are best suited to your personal and investment goals and risk tolerance.

Note: CAFS is affiliated with CommunityAmerica Credit Union. Employees of CommunityAmerica Credit Union may refer clients to CAFS to speak with an Advisor regarding the investment advisory services described in Item 4 above. Employees who make a referral to CAFS will receive a one-time payment of \$10 to \$50.

ITEM 6 – PERFORMANCE-BASED FEES

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

ITEM 7 – TYPES OF CLIENTS

We provide investment advisory services to individuals, entities, charitable institutions, foundations, endowments, and trusts. We will accept new advisory clients regardless of their investable assets or account size. There is no minimum requirement.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

TPMA

Your Advisor will review and analyze the information provided by you in the initial CAFS client agreement and any other data provided by you and will use such information to create an IP. Your Advisor will use the IP to recommend a Manager(s).

The Manager(s) you select will determine the method and source of their investment analysis and investment styles and may utilize varying techniques in formulating investment advice or managing assets for clients. Please refer to the Brochure of each Manager for more information about their investment styles, investment selection, performance and fees. CAFS will, as part of its ongoing Manager due diligence, determine if and when a Manager should be replaced due to poor performance or concerns with non-compliance with regulatory requirements. When determining whether or not to replace a Manager, CAFS may also take into account the number of client assets held with that particular Manager and the overall cost and tax impact to, or on, you that replacing the Manager may cause. Clients must consider that replacing a Manager may result in the sale of your securities, which will likely subject you to adverse tax obligations. CAFS will meet at least yearly with the TPMA Managers.

AAMP

AAMP Portfolios are developed for us by various Investment Strategists and will be used to implement an asset allocation strategy. Asset allocation is one investment style that may assist you in ensuring that you have an appropriate mix of Underlying Investments to achieve positive investment results based on your financial and personal objectives, time horizon and risk tolerance. We believe that by using AAMP you may be able to minimize the effects of investment risk because investment gains in one asset class may offset losses in another. Of course, there is no certainty that any investment strategy, including asset allocation, will be profitable or successful in achieving your investment objectives. Your investment principal will fluctuate with the financial markets. Therefore, your Underlying Investments may be worth more or less than you originally paid for them at the time you decide to sell or redeem them.

If you have a substantial amount of your net worth concentrated in one or a small number of Underlying Investments or asset classes when you establish an AAMP account(s), the asset allocation process we use may require your Advisor to recommend that you sell some or all of your existing Underlying Investments and asset classes and invest the proceeds in your AAMP Portfolio(s). It is always important to consult your legal and tax advisors before making significant changes to your existing Underlying Investments because such changes can create adverse tax consequences.

You should never assume that the future performance of any specific Underlying Investment(s) or investment strategy will be profitable. Investing in any class of Underlying Investments (including mutual funds, ETFs and individual stocks recommended in AAMP) involves the risk of loss. Different types of Underlying Investments have varying degrees of risk. You must be prepared to experience loss of value in your Underlying Investments in your AAMP Portfolio(s), including the loss of your original principal.

Neither we nor your Advisor represent, guarantee, or even imply that our investment advisory services related to AAMP:

- can or will accurately predict future financial results
- successfully identify market tops or bottoms
- insulate your Underlying Investments from losses due to market corrections or declines

There are certain additional risks that you should consider when investing in an AAMP Portfolio(s) including, but not limited to:

- Risk of Owning Individual Stocks – Individual stocks are susceptible to general market fluctuations and to volatile increases and decreased in value as market confidence in and perceptions of their issuers change.
- ETF and Mutual Fund Risk – Owning ETFs and mutual funds involves certain investment management and operating expenses, which are shared on a pro rata basis by all owners of these Underlying Investments. The risk of owning an ETF or mutual fund is directly proportional to the risk of the Underlying Investments held by them. You may incur brokerage costs when purchasing and selling ETFs. Leveraged and inverse ETFs are not appropriate for many investors due to their unique characteristics and market risks. Although leveraged and inverse ETFs can be a useful investment tool for some investors and in limited circumstances, it is extremely important for you to understand that holding these ETFs longer than one day may result in significant losses.
- Asset Allocation and Monitoring – Strategists have agreed to provide us from time to time any updates or changes they make to the models they provide, including changes to asset allocation and underlying investment selection. Your Advisor will, on a discretionary basis without consulting you in advance, determine whether and in what manner to implement a Strategist's recommended changes. The failure of your Advisor to implement your Strategist's changes in a timely manner or at all may result in losses in the value of your AAMP Portfolio(s). Also, there is no assurance that the performance of your AAMP Portfolio will track that of any benchmark or index, including those that may be used in AAMP marketing materials.
- General Risks of Investing – All Underlying Investments and investment strategies involve risk, the degree of which may vary significantly. Investment performance can never be predicted or guaranteed, and the value of your Underlying Investments will fluctuate due to market conditions and other factors. Investments made and the actions taken by your Advisor with respect to the Underlying Investments your AAMP Portfolio(s) will be subject to various market, liquidity, economic and political risks that we and you cannot control. You should review the offering materials and other disclosures available for each of your Underlying Investments to obtain an accurate appreciation for their associated risks and fees

ITEM 9 – DISCIPLINARY INFORMATION

We are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our investment advisory activities. We have no applicable information to disclose.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We are dually registered as a broker-dealer and federally registered investment advisor. These are our primary businesses. In addition, CommunityAmerica Credit Union, a related entity, is qualified to sell NCUA regulated products in certain counties in Kansas and Missouri. Another related entity, CommunityAmerica CUSO One, LLC, is licensed to sell insurance and mortgage products. Your advisor is registered with our broker-dealer and investment advisor. In this capacity, your Advisor will receive compensation from advising clients to establish brokerage, financial planning and investment advisory relationships with us.

As a result of providing financial planning services to you, your Advisor may recommend that you invest in Underlying Investments and investment services that will result in compensation being paid to your Advisor. This presents a conflict of interest.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

We place significant value on ethical conduct for all advisory business. In addition to our obligation to comply with the federal securities laws, We have established a standard of business conduct required of all our personnel in our Code of Ethics. Our Code of Ethics is designed to protect clients by deterring misconduct and preventing fraud by reinforcing fiduciary principles that must govern the conduct of our personnel. An Adviser, as a fiduciary to its clients, is responsible for providing professional, continuous, and unbiased investment advice. Fiduciaries owe their clients a duty of honesty, good faith, and fair dealing. In order to ensure that our Advisors and employees strictly adhere to the highest standard of conduct and integrity in conducting business on behalf of our clients, we require all personnel to sign our Code of Ethics.

In addition, the Code of Ethics governs personal trading by all personnel and is intended to ensure that personal securities transactions effected by personnel are conducted in a manner that avoids any actual or potential conflict of interest between personnel and clients of us or our affiliates. We collect and maintain records of securities holdings and securities transactions effected by its personnel. These records are reviewed to identify and resolve potential conflicts of interest. We will furnish a copy of its Code of Ethics to you upon request. You may contact your Advisor at their office number or our home office at 913.905.3600.

ITEM 12 – BROKERAGE PRACTICES

The broker/dealer that maintains your advisory account and executes trades is also referred to as the qualified custodian. Your TPMA Manager will select the broker/dealer to hold your account(s). A TPMA Manager may use one or several broker-dealers as custodians. This may include one of our Clearing Firms (described in Item 15 below). Your AAMP account(s) will be held by one of our Clearing Firms. All purchases and sales of Underlying Investments in your TPMA and AAMP accounts will be executed through and held by the broker-dealer(s) selected by your Manager for TPMA accounts (which may include one or more of our Clearing Firms) and one of our Clearing Firms for AAMP accounts.

Please see each Manager's Brochure for further information about order handling, including aggregating or bunching orders.

We have a trade error procedure to resolve trading errors that may occur in AAMP accounts. Corrections are reviewed and approved by our operations personnel. Corrections will be processed, to the extent the markets are open, in a timely manner in an attempt to ensure no material financial harm to you. Gains on trade error corrections will typically be offset by losses in our trading account, if any.

CAFS does not have soft dollar arrangements nor does it receive any client referrals from broker dealers that it recommends.

ITEM 13 – REVIEW OF ACCOUNTS

For TPMAs, each Advisor is responsible for reviewing new account documents and initial transactions. New AAMP accounts are reviewed and approved by a Supervisory Principal. Your Advisor monitors AAMP accounts on a periodic basis, but at least quarterly. You and your Advisor will meet at least annually to discuss whether or not to change or terminate a TPMA Manager or change an AAMP portfolio or any of its Underlying Investments. Annual reviews are documented and retained by us. Your Advisor must obtain your written permission to change or terminate a TPMA Manager or AAMP portfolio.

You will receive from qualified custodians, including our Clearing Firms, at a minimum, quarterly account statements describing positions and activity in your TPMA and AAMP portfolio accounts. For any month there is activity in the account, you will receive a statement detailing that month's activity. We (not your advisor) provide written performance reports and consolidated statements for AAMP accounts. We urge you to carefully review these performance reports and consolidated statements and alert us and your Advisor promptly if there are any discrepancies or errors. Written performance reports and consolidated statements may be provided by your TPMA Manager detailing your current asset allocation and performance. We urge you to compare performance reports and consolidated statements to the official account statements that reflect your account holdings provided at least quarterly by your qualified custodian, including our Clearing Firms as applicable, to ensure that your Underlying Investments listed on these reports and statements match the Underlying Investments on the official account statements provided by your qualified custodian.

Financial planning services terminate upon delivery of the financial plan. Thus, there are no ongoing reviews conducted by us. However, your Advisor will offer you the opportunity for periodic reviews as desired. You may also choose to engage us for subsequent services to review and update your financial plan at any time due to major life events or changes in the economic environment. If you engage us to prepare an updated plan, you will enter into a new investment advisory agreement for financial planning services. All financial planning updates or reviews are conducted by your Advisor.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

SOLICITATION ACTIVITIES AND RECEIPT OF REFERRAL FEE

CAFS acts as a Solicitor for various TPMA Managers pursuant to solicitation agreements with the Managers. CAFS and your Advisor will receive compensation for referring clients to TPMA Managers for investment management services. The nature of the Solicitor relationship and the amount of compensation is disclosed by your Advisor to you in writing before or at the time of the referral.

OTHER COMPENSATION

CAFS receives, in addition to the fees discussed in Section 5 above compensation (sometimes referred to as revenue sharing) from certain TPMA Managers to assist in paying for ongoing marketing and sales support activities including, but not limited to, training, educational meetings, due diligence reviews, and day-to-day marketing and/or promotional activities. Not all Managers pay such compensation.

ITEM 15 – CUSTODY

We are dually registered as a broker-dealer and federally registered investment advisor. As such, we custody all Underlying Investments in AAMP accounts with our clearing firms (Clearing Firms):

TD Ameritrade Institutional

A division of TD Ameritrade, Inc.
PO Box 650657
Dallas, TX 75265-0567

Apex Clearing Corporation

350 North St. Paul Street
Suite 1300
Dallas, TX 75201

For TPMA accounts your advisory Underlying Investments will be maintained by the qualified custodian selected by the Manager, which may include one of our Clearing Firms. All qualified custodians are independent and have no affiliation with us.

You will receive quarterly statements and possibly other reports from your qualified custodians for each of your TPMA and AAMP accounts. We urge you to carefully review each statement and report and alert your Advisor promptly if there are any discrepancies or errors. Additionally, you are reminded to make all checks and securities payable/endorsed to the specific qualified custodian(s) of your TPMA and/or AAMP accounts, and not to us or your Advisor.

ITEM 16 – INVESTMENT DISCRETION

For discretionary AAMP accounts, you will grant to your Advisor discretionary authority to buy and sell Underlying Investments in your AAMP Portfolio(s) without first consulting you. Similarly, you will grant to your TPMA Manager(s) discretionary authority to buy and sell Underlying Investments. Discretionary authority includes the authority to determine the security and the amount to be bought or sold without obtaining your prior consent. Discretionary authority is granted only in writing signed you.

ITEM 17 – VOTING CLIENT SECURITIES

Neither we nor your Advisor vote proxies for Underlying Investments held in either TPMA or AAMP accounts. You retain the responsibility for receiving and voting proxies. You will from time to time receive proxy solicitations from the custodian and/or transfer agent of your Underlying Investments. You should contact the person identified in the proxy materials with any questions about a particular proxy solicitation.

ITEM 18 – FINANCIAL INFORMATION

We do not meet the requirements of the Act and rules promulgated thereunder that require investment advisors to provide financial information.

ITEM 19 – STATE REGISTERED ADVISERS

We are a federally registered advisor. As such this item does not apply to us.