

**Summary of Material Changes:**

The following summary discusses the material changes that Comprehensive Wealth Management, LLC (CWM) has made to Form CRS.

CWM advisors are no longer affiliated with a broker-dealer and related conflicts of interest have been removed from Form CRS wherever they appeared.

CWM has clarified that we offer a “bundled fee” rather than a “wrap fee” arrangement, under which we charge our advisory fee as the custodian assesses its typical custody and transaction fees, but CWM agrees to pay most of those fees on behalf of the client. CWM does NOT share any portion of its advisory fee with the custodian or other service providers.

### Introduction

Comprehensive Wealth Management, LLC (CWM) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. The services offered and fees charged by an investment adviser differ from those of broker-dealers and it is important that you understand the differences. There are free and simple tools available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about investment advisers, broker-dealers, and investing.

### What investment services and advice can you provide me?

We offer investment advisory services through our proVest Program Agreement (“Agreement”). CWM is the only money manager on the proVest Program. We provide investment advisory services, including discretionary investment management and financial planning services to individuals, trusts, and estates (our “retail investors”). The type of investments we choose for you will vary due to the size of your account, risk tolerance, and objectives.

- We will work with you to understand your current financial situation, existing resources, investment goals, and risk tolerance. Based on what we learn, we will design a strategy with you to help you achieve your objectives through a portfolio of investments, and we regularly monitor and rebalance your portfolio at least quarterly. We will adjust recommendations to meet your changing needs, stated goals, and objectives. The type and frequency of service you receive may vary based upon the program selected.
- We typically manage accounts on a discretionary basis. After you sign an agreement with our firm, we can buy and sell investments in your account without asking you in advance. Any limitations will be described in the signed proVest Program Agreement. We will have discretion until the advisory agreement is terminated by you or our firm.
- We do not restrict our advice to limited types of products or investments.
- We generally require a minimum portfolio size of \$500,000 to participate in the *CWM Performance Targeting System (PTS®)* program and \$100,000 for the *CWM Wealth Accumulator* program under our proVest Agreement. We will waive this minimum account size at our discretion.

**Additional information about our advisory services is in Item 4, 7, and 10 of our Firm Brochure, which is available online at [www.CWMnw.com/adv](http://www.CWMnw.com/adv).**

#### *Ask your CWM Financial Advisor*

- Given my financial situation, should I choose an investment advisory service? Should I choose a Brokerage product or service? Should I choose both types of services? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do those qualifications mean to me?

### What fees will I pay?

CWM typically charges an asset-based fee (a percentage of assets in your account) for services provided under the proVest Program Agreement. You will be charged an ongoing quarterly fee, which typically will not exceed 2% annually, based on the value of the investments in your account. The fees are negotiable based on a number of factors that could result in a client paying a fee greater or less than the standard fee.

- We typically deduct our AUM Fee from one or more of your accounts, in advance, on a quarterly basis. Since our fee is based on a percentage of assets in your advisory account(s), we have an incentive to increase your account value to increase our compensation.
- While financial planning and/or consulting services are typically incorporated into our fee, we also offer stand-alone financial planning and/or consulting services for a fixed or hourly rate; these rates are negotiated depending on the complexity and level of the service.
- For certain investments, you may pay a commission to a third party instead of an asset-based fee and/or pay charges imposed by the broker-dealer or custodian maintaining your account. Some investments, such as mutual funds, index funds, exchange traded funds, and variable annuities, charge additional fees that will reduce the value of your investments over time. In addition, you may have to pay fees such as “surrender charges” to sell variable annuities.
- Our advisory fees are “bundled” with the costs of executing transactions through the custodian. This means we pay for most transaction costs and fees to a broker-dealer or bank that has custody of these assets and therefore are higher than a typical asset-based advisory fee.

***You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Additional information about our fees is in Item 5 of our Firm Brochure, which is available online at [www.CWMnw.com/adv](http://www.CWMnw.com/adv).***

*Ask your CWM Financial Advisor*

- Help me understand how these fees and costs may affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?

**What are your legal obligations to me when acting as my investment adviser?  
How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser**, we have to act in your best interest and not put our interest ahead of your own. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

Our primary conflict of interest is our receipt of asset-based fees. For example, if you asked us for a recommendation about paying down outstanding debt or making charitable contributions, versus keeping those funds in your account with us, we have a conflict of interest in making the recommendation because we earn more advisory fees when you keep more assets in your account. However, we will always make the recommendation that we believe is in your best interest.

- CWM's investment advisor representatives (IARs) also act as insurance agents. As insurance agents, they will receive compensation based upon whether, and in what amount, clients purchase insurance products through them. They have an incentive to recommend insurance products to you.
- As part of the proVest Program Agreement, we pay most charges associated with securities transactions made in your account; Because of this, we have financial incentive not to make securities transactions in your account, or choose securities that won't incur a transaction fee which may result in the selection of a fund with a higher expense ratio. You, the owner of the fund, ultimately pay the fee by way of the fee charged by the mutual fund. Paying for securities transactions in your investment portfolio creates a potential conflict of interest where we have the financial incentive not to make securities transactions in your account when it is in your best interests to do so.

**Additional information about our conflicts of interest is in Item 10, 11 and 12 of our Firm Brochure, which is available online at [www.CWMnw.com/adv](http://www.CWMnw.com/adv).**

*Ask your CWM Financial Advisor*

- How might your conflicts of interest affect me, and how will you address them?

**How do your financial professionals make money?**

Our financial professionals are generally compensated on a salary basis and may receive additional compensation based on the profitability of the firm. Certain of our professionals receive commissions for selling insurance products, and thus may have an incentive to recommend the sale of these insurance products versus other products or investments that do not pay commissions. You should discuss your financial professional's compensation directly with your financial professional.

**Do you or your financial professionals have legal or disciplinary history?**

Yes. Visit [www.investor.gov/CRS](http://www.investor.gov/CRS), for a free and simple search tool to research our firm and our financial professionals.

*Ask your CWM Financial Advisor*

- As a financial professional, do you have any disciplinary history? For what type of conduct?

**Additional Information**

You can find additional information about our firm's investment advisory services on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may also contact us at any time to request a current copy of our current *Client Relationship Summary* at (425) 778-6160 or email [info@CWMnw.com](mailto:info@CWMnw.com).

*Ask your CWM Financial Advisor*

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?