

**FORM ADV PART 2 A
DISCLOSURE BROCHURE**

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This brochure provides information about the qualifications and business practices of Compass Retirement Group LLC. If you have any questions about the contents of this brochure, please contact us at 314-373-1598. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority. **Registration as an investment adviser does not imply a certain level of skill or training.**

Additional information about Compass Retirement Group LLC (IARD#282420) is available on the SEC's website at www.adviserinfo.sec.gov

March 25, 2024

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Compass Retirement Group LLC has made the following updates to this brochure since its last update on June 13, 2023.

- Named Charmain Lewis as the Chief Compliance Officer of Compass Retirement Group effective February 5, 2024.
- Item 19: Requirements for State-Registered Advisers
 - Removed Item 19 due to CRG transitioning from Missouri registration to SEC registration.

Item 3: Table of Contents

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Item 4: Advisory Business

Firm Description

Compass Retirement Group LLC ("CRG") was founded in November 2015. Marvin L. Mitchell is the sole owner.

CRG is a registered investment adviser that offers investment advisory services to clients through portfolio management and the selection of third-party investment advisers. In offering our investment advisory services, CRG generally utilizes one or more third-party asset managers to assist CRG in the management of client assets.

Registration as an investment adviser does not imply a certain level of skill or training.

Types of Advisory Services

CRG offers investment advisory services through portfolio management and the selection of other third-party investment advisers. CRG asks that clients provide the Firm discretionary authority to manage client's assets. This means that the Firm has the authority to decide which securities to purchase and sell for the Client. This also means that the Firm has the authority to decide which third-party investment advisers to retain on behalf of the Client.

When offering its investment advisory services to Clients, CRG typically utilizes a third-party investment management platform that enables CRG to offer one or more investment models managed by third-party investment advisers to Clients. Through this platform, models offered by CRG generally utilize various security products (depending on the model selected), including but not limited to equities, bonds, exchange traded funds ("ETFs"), mutual funds, and/or other securities in association with the model selected. As part of CRG's investment advisory services, CRG works with Clients to understand their individual financial situation, including but not limited to, the Client's risk tolerance, investment objectives, financial / liquidity restraints, and other pertinent factors affecting the Client's needs. Each Client's individual circumstances will form the basis for which model(s) are utilized by CRG in managing the Client's assets.

There are fees associated with CRG's use of this third-party investment management platform and subsequent models that are borne by the Client. Greater detail about these fees can be located in Item 5: Fees and Compensation. Additionally, CRG will deliver the Form ADV Part 2A, Privacy Notice, and fee schedule for the platform provider at or before the time of entering into an agreement.

As part of our services to clients, CRG may introduce or otherwise help clients identify other professionals (e.g. lawyers, accountants, tax preparers, realtors, etc.) to assist them with their planning needs. CRG does not have any arrangements by which they are compensated for these activities. However, CRG does have associates that are able to offer CRG clients insurance products and services and those individuals do typically receive compensation in the form of commissions. This creates a conflict of interest as a CRG investment adviser representative may recommend a client purchase an insurance product due to this compensation.

CRG holds seminars and workshops to educate the public on different types of investments

and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

Rollover Recommendations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the agreement you execute with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of: (1) Leaving the funds in your employer's (former employer's) plan; (2) moving the funds to a new employer's retirement plan; (3) cashing out and taking a taxable distribution from the plan; and/or (4) rolling the funds into an IRA rollover account. Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney. Our recommendations may include any of them, depending on what we feel is in your best interest.

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. As a fiduciary, we are required to document the reason(s) for why the recommendation we made is in your best interest.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

CRG does not sponsor any wrap fee program.

Client Assets under Management

As of December 31, 2023, CRG had \$99,385,948.53 of discretionary assets under management. The Firm had no non-discretionary assets under management.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

The following are the fees charged by CRG for services provided. Lower fees for comparable services may be available from other sources.

Total Assets Under Management	Annual Fee
\$0.00 to \$ 250,000.00	1.50%
\$ 250,001.00 to \$ 500,000.00	1.30%
\$ 500,001.00 to \$ 1,000,000.00	1.10%
\$ 1,000,001.00 to \$ 3,000,000.00	0.90%
\$ 3,000,001.00 to 5,000,000.00	0.75%
\$ 5,000,001.00 and Up	0.65%

This table represents CRG's standard fee schedule. Fees charged by CRG for advisory services are paid monthly in arrears and are based on the average daily balance of the account during the billing period. CRG's fees are negotiable.

As discussed in Item 4: Advisory Business, CRG typically utilizes a third-party investment management platform that enables CRG to offer one or more investment models managed by third-party investment advisers to Clients. Fees associated with the third-party investment management platform are in addition to the CRG advisory fees listed in the above fee table. These additional fees include, but are not limited to, Account Maintenance Fee, Administrative Fee, Third-Party Advisory Fee, and, if applicable, a Trading and Custody Fee. These fees are located in a Fee Addendum that is provided to Clients at or before the time of entering into an advisory agreement.

Client shall be given thirty (30) days' prior written notice of any proposed increase in fees. Any increase in fees shall be accompanied by an amendment or execution of a new contract, with signatures from both parties evidencing acceptance of new fees.

Client may terminate the Agreement within five (5) business days of signing the Agreement, without penalty or fee. Thereafter, this Agreement shall continue in effect until terminated by either party by giving to the other party 30 days' written notice.

Valuation

In computing the market value of any investment of the Account, the securities in the Account listed on a national securities exchange or otherwise subject to current last sale reporting shall be valued at the amount reported on the statement that Client receives from the Custodian. Such securities which are not traded nor subject to last sale reporting shall be valued at the latest available bid price reflected by quotations furnished to Adviser by such sources as it may deem appropriate. Any other security shall be valued in such manner as

shall be determined in good faith by Adviser and Client to reflect its fair market value.

Client Payment of Fees

Fees charged by the third-party investment management platform are separate and distinct from fees charged by CRG. When entering into an advisory agreement with CRG, Clients provide CRG the authority to deduct fees directly from the Client's account. This authority is also provided to the third-party investment management platform.

Additional Client Fees Charged

In addition to CRG's advisory fee and fees associated with the use of a third-party investment management platform, Clients may also incur other types of expenses such as custodian fees or mutual fund expenses. For models that utilize mutual funds, the third-party investment management platform's policy is to utilize the cheapest share class available offered at all custodians where the model or strategy is available. Therefore, it is possible that a particular custodian may offer a cheaper share class, but it will not be used in the model or strategy because not all other custodians offer that particular share class. Additionally, Clients may also incur brokerage and other transaction costs. Clients always have the option to purchase

CRG recommended products through other brokers or agents that are not affiliated with CRG.

CRG holds seminars and workshops to educate the public on different types of investments and the different services they offer. CRG does not charge a fee to attendance of these seminars.

External Compensation for the Sale of Investment products or Securities to Clients

CRG does not receive any external compensation for the sale of securities to Clients, nor do any of the investment adviser representatives of CRG.

Item 6: Performance-Based Fees and Side-by-Side Management

CRG does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

CRG provides investment advice to individuals and high net worth individuals. Client relationships vary in scope and length of service.

Account Minimums

CRG does not have account minimums. Certain models or strategies utilized by CRG in managing client assets have minimum investment amounts. These minimums are set by the third-party investment adviser managing the particular model or strategy.

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

Methods of Analysis

CRG primarily utilizes third-party advisers in the management of Client assets. Third-party investment advisers utilized by CRG use various methods of analysis to determine the proper strategy for the Client referred and these will be disclosed in the third-party money manager's Form ADV Part 2. The main sources of information used by third-party investment advisers may include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

In developing a financial plan for a Client, CRG's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation. CRG's methods of analysis include fundamental analysis, quantitative analysis, and technical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations (e.g. character of management or the state of employee morale) such as the value of assets, cost of capital, historical projections, etc.

Technical analysis involves the analysis of past market data, primarily price and volume.

Investment Strategy

CRG's primary investment strategies include long-term trading and the selection of other investment advisers. CRG utilizes the information gathered during Client consultations to help each client develop a strategy specific to that Client's particular goals and objectives.

Long-term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: Although CRG will seek to select only third-party investment advisers who will invest clients' assets with the highest level of integrity, CRG's selection process cannot ensure that those advisers will perform as desired and CRG will have no control over the day-to-day operations of any of its selected advisers. CRG would not necessarily be aware of certain activities at the third-party adviser level, including without limitation an adviser engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Security Specific Material Risks

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any

other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature or stock “equity” nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured

products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting; however, they carry a potential risk of losing share price value. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Annuities are a retirement product for those who may have the ability to pay a premium now in exchange for receiving certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Additional risks associated with the models and strategies may be located in each respective third-party investment adviser's Form ADV Part 2A.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

Criminal or Civil Actions

The firm and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Marvin Mitchell, in or about December 2017 through July 2018, was engaged in the business of effecting or attempting to effect purchases or sales of global notes issued by 1 global capital, LLC a/k/a 1st global capital, LLC, a/k/a 1st global capital financial services in Pennsylvania. These notes were neither registered nor exempt from registration. Marvin Mitchell was also neither registered, nor exempt from registration, which violated the Pennsylvania securities act of 1972. A consent agreement and order was entered in which Marvin Mitchell agreed to pay an administrative assessment of \$2,500.00 monthly for six months beginning 9/1/21.

Self-Regulatory Organization Enforcement Proceedings

In the proceeding described above relating to the sale of global notes without proper registration, Marvin Mitchell was assessed a monetary fine of \$2,500.00 monthly for six months beginning 9/1/21 by Pennsylvania Department of Banking and Securities.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Neither CRG nor its employees are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither CRG nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Marvin L. Mitchell and other investment adviser representatives of CRG are licensed insurance agents. From time to time, they will offer Clients advice or products from this activity. Insurance products are offered under CRG's affiliate, Compass Retirement Solutions, LLC.

This practice represents a conflict of interest because it gives Mr. Mitchell and CRG investment adviser representatives an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Mitchell and CRG investment adviser representatives have a fiduciary responsibility to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Marvin L. Mitchell also owns and operates Path to Prosperity, a professional business and life coaching organization that seeks to help business professionals develop business and personal growth strategies. While this activity is separate and distinct from the activities of CRG, and the services of Path to Prosperity are not actively marketed to CRG Clients, Clients of CRG are permitted to also be Clients of Path to Prosperity if they so choose.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

As previously disclosed, CRG typically utilizes investment models managed by third-party investment advisers for CRG Clients. CRG does not receive compensation from, nor does it share in any fees received by third-party investment advisers or the third-party investment management platform they are made available through.

Clients are not required to accept any recommendation of third-party investment advisers given by CRG and have the option to receive investment advice through other advisers of their choosing.

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

Code of Ethics Description

The employees of CRG have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of CRG employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of CRG. The Code reflects CRG and its supervised persons' responsibility to act in the best interest of their Client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. CRG does not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

CRG's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer, or director of CRG may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

CRG's Code is based on the guiding principle that the interests of the Client are our top priority. CRG's officers, directors, advisors, and other employees have a fiduciary duty to our Client's and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either employees or the company.

The Code applies but is not limited to “access” persons. “Access” persons are employees who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

CRG will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

CRG and its employees do not recommend to Client's securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

CRG's employees may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client trades, employees are required to disclose all reportable securities transactions as well as provide CRG with copies of their brokerage statements.

The Chief Compliance Officer of CRG, or designee, reviews employee trades each quarter. The personal trading reviews help ensure that the personal trading of employees does not affect the markets and that Clients of the firm receive preferential treatment over employee transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

CRG does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

We recommend the custodian and brokerage services of Fidelity Brokerage Services, LLC ("Fidelity") or Charles Schwab & Co. ("Charles Schwab"). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services.
- The likelihood that your trades will be executed.
- Availability of investment research and tools.
- Overall quality of services.

- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

CRG does not select broker-dealers for Client transactions. CRG recommends Fidelity Brokerage Services LLC, and Charles Schwab & Co. through the Orion Portfolio Solutions Investment Management Platform.

- *Directed Brokerage*
CRG does not trade client accounts and therefore it does not take direction from Clients as to what broker-dealer to use.
- *Best Execution*
CRG does not trade client accounts and has limited access to detailed trade execution data. CRG does, however, does perform periodic best execution reviews.
- *Client Referrals*
CRG does not receive client referrals from a broker dealer or third party.
- *Soft Dollar Arrangements*
CRG does not maintain any soft dollar arrangements.

Aggregating Securities Transactions for Client Accounts

CRG does not aggregate trades for its Clients' accounts.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Accounts are generally reviewed on a quarterly basis by Investment Adviser Representatives of CRG. Account reviews are performed more frequently when market conditions dictate.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for accounts directly from their custodian. Clients receive confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Clients may also receive additional reports directly from the third-party investment advisers for which they are invested in a model or strategy.

Item 14: Client Referrals and Other Compensation

Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest

CRG does not receive any economic benefits from external sources for providing investment advice to its clients. CRG receives no compensation or fee sharing of any kind from either the

investment management platform used, or the third-party investment advisers of the models or strategies utilized by Clients.

CRG does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians who will provide account statements directly to Clients at their address of record no less than quarterly. Clients are urged to compare the account statements received directly from their custodians to any performance report prepared by CRG or a third-party investment adviser.

Limited Custody and Direct Fee Deduction

Our ability to deduct our advisor fees from your account(s) causes our firm to have limited custody over your funds or securities. We do not have physical custody of any of your funds or securities. Since our firm's custody is limited to the withdrawal of advisory fees, we are not required to obtain a surprise annual audit as we would otherwise be required to by having custody.

Item 16: Investment Discretion

Discretionary Authority for Trading

CRG will request that Client's provide CRG with discretionary authority. The investment advisory agreement between CRG and each client sets forth the discretionary authority for trading. When investment discretion has been granted, CRG will have the authority to direct the purchase, sale, exchange, and transfer securities in each account in which discretion is provided and in accordance with the Client's investment guidelines, objectives, and restrictions, as set forth in the advisory agreement.

Item 17: Voting Client Securities

Proxy Votes

CRG does not accept proxy voting authority from Clients. Clients are expected to vote their own proxies and will receive their proxies directly from the custodian of their account or from a transfer agent. CRG does not opine on how clients should vote proxies.

Item 18: Financial Information

Balance Sheet

CRG does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

CRG has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

CRG does not have any information to disclose.