

Item 1 - Cover Page
Form ADV Part 2A

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February 14, 2014 Brochure

This brochure provides information about the qualifications and business practices of Compass Wealth Management, LLC ("Compass"). If you have any questions about the contents of this brochure, please contact us at (678) 619-2364 or robert.amato@compasswm.net or beau.davis@compasswm.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Additional information about Compass also is available on the SEC's website at www.AdviserInfo.sec.gov.

Item 2 - Material Changes

Registered Investment Advisers are required to use this format in order to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any change to our policies, practices, or conflicts of interest made since our last annual update. This Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on February 1, 2013. Of course the complete Brochure is available to clients at any time upon request.

Our brochure may be requested free of charge by contacting Robert Amato or Beau Davis at (678) 619-2364 or robert.amato@compasswm.net or beau.davis@compasswm.net. Additional information about Compass Wealth Management, LLC is also available via the SEC's website www.adviser.sec.gov. The website also provides information about any persons affiliated with Compass Wealth Management, LLC who are registered, or are required to be registered, as investment adviser representatives of Compass Wealth Management, LLC.

Item 4 – Amended discretionary assets under management from \$122,868,000 as of December 31, 2012 to \$136,800,000 as of February 12, 2014.

Item 5 – Added disclosure to state fee adjustments will be made for account inflows and/or outflows if the amount of the deposit/withdrawal is at least \$30,000.

Item 5 – Added the following disclosure: The broker/dealer recommended by Compass offers various securities (typically limited to open ended mutual funds) with no transaction fees assessed if the particular securities are traded. However, there is a holding period required or a transaction charge will be assessed by the broker/dealer. Compass does not share in the transaction fees. The holding period will range from 90 days to six months. Compass does not purchase or sell securities based on the security having no transaction fees and does not decide to hold a security longer as a result of a security not satisfying the holding period.

Item 12 – The following disclosure was added: Consequently, Compass may not be able to achieve the most favorable execution of transactions and could cost the client more money. Not all investment advisers require or recommend their clients to direct brokerage to a particular broker/dealer.

Item 13 – Added disclosure to suggest clients compare reports received from Compass with those reports received direct from the account custodian.

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Item 4 - Advisory Business

General Information

Compass Wealth Management, LLC was formed in 2011 and provides financial planning and portfolio management services to its clients. At the outset of each client relationship, Compass spends time with the client, asking questions, discussing the client's investment experience and financial circumstances, and reviewing options for the client. Based on its reviews, Compass generally develops with each client:

- a financial outline for the client based on the client's financial circumstances and goals, and the client's risk tolerance level (the "Financial Profile"); and
- the client's investment objectives and guidelines (the "Investment Plan").

The Financial Profile is a reflection of the client's current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments Compass will make on behalf of the client in order to meet those goals. The Profile and the Plan are discussed regularly with each client, but are not necessarily written documents.

Financial Planning

Compass offers financial planning services to those clients in need of such service in conjunction with Portfolio Management services. Compass's financial planning services normally address areas such as general cash flow planning, retirement planning, and insurance analysis. The goal of this service is to assess the financial circumstances of the client in order to more effectively develop the client's Investment Plan. Financial Planning is not offered as a stand-alone service or for a separate fee, but is typically provided in conjunction with the management of the portfolio.

Portfolio Management

As described above, at the beginning of a client relationship, Compass meets with the client, gathers information, and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by Compass based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, Compass will manage the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, Compass will have the authority to supervise and direct the portfolio without prior consultation with the client.

Notwithstanding the foregoing, clients may impose certain written restrictions on Compass in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments (e.g., "sin stocks") in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ and clients should not

expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of Compass.

Principal Owners

Robert A. Amato and Beau H. Davis are the principal owners of Compass. Please see **Brochure Supplements**, Appendix A, for more information on these principal owners and other individuals who formulate investment advice and have direct contact with clients, or have discretionary authority over client accounts.

Type and Value of Assets Currently Managed

As of February 12, 2014, Compass managed \$ 136,800,000 assets on a discretionary basis, and no assets on a non-discretionary basis.

Item 5 - Fees and Compensation

General Fee Information

Fees paid to Compass are exclusive of all custodial and transaction costs paid by the client to the client's custodian, brokers or other third party consultants. Please see **Item 12 - Brokerage Practices** for additional information. Fees paid to Compass are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, Compass and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

The broker/dealer recommended by Compass offers various securities (typically limited to open ended mutual funds) with no transaction fees assessed if the particular securities are traded. However, there is a holding period required or a transaction charge will be assessed by the broker/dealer. Compass does not share in the transaction fees. The holding period will range from 90 days to six months. Compass does not purchase or sell securities based on the security having no transaction fees and does not decide to hold a security longer as a result of a security not satisfying the holding period.

Portfolio Management Fees

The annual fee schedule is based on a percentage of assets under management. For Growth, Moderate and Conservative Asset Allocation Models, the fee schedule is:

First \$200,000	1.75%
Next \$300,000	1.50%
Next \$500,000	1.25%
Next \$1,000,000	1.00%
Next \$3,000,000	0.85%
Over \$5,000,000	0.75%

For Fixed Income allocation accounts, the annual fee schedule is also based on a percentage of assets under management as follows:

First \$200,000	1.25%
Next \$300,000	1.15%

Next \$500,000	1.00%
Next \$1,000,000	0.85%
Next \$3,000,000	0.75%
Over \$5,000,000	0.65%

Compass may, at its discretion, negotiate special fee arrangements where Compass deems it appropriate under the circumstances.

Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. Fee adjustments will be made the following quarter for any inflows or outflows occurring in the account if the deposit/withdrawal is at least \$30,000. Fees are normally debited directly from client account(s), unless other arrangements are made.

Either Compass or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to Compass from the client will be invoiced or deducted from the client's account prior to termination.

Other Compensation

Beau Davis, Managing Partner of Compass, is also a registered representative of Purshe Kaplan Sterling ("PKS"), a FINRA and SIPC member, and registered broker/dealer. As such, he is entitled to receive commissions or other remuneration on the sale of insurance and other products. In order to protect client interests, Compass' policy is to fully disclose all forms of compensation before any such transaction is executed. Normally, clients will not pay both a commission to Mr. Davis and also pay an advisory fee to Compass on assets held in the same account. These fees are normally exclusive of each other.

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

Compass does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Compass has no performance-based fee accounts, it has no side-by-side management.

Item 7 - Types of Clients

Compass' typical clients are high net worth individuals. Compass may also serve small businesses.

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

Methods of Analysis

In accordance with the Investment Plan, Compass generally selects mutual funds and exchange traded funds (ETF's) for client accounts.

Mutual funds and ETFs are generally evaluated and selected based on a variety of factors, including, without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

Fixed income investments may be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. Compass may evaluate and select individual bonds or bond funds based on a number of factors including, without limitation, rating, yield and duration.

Investment Strategies

Compass utilizes four basic asset allocation models: growth, moderate, conservative and fixed. The specific investments for each individual client will vary depending upon the unique circumstances of the client.

Based on the macro view of the equity and fixed income markets, and taking into consideration the specific risk tolerance and objectives of each client, Compass determines the most appropriate exposure to each type of asset class, such as cash and equivalents, fixed income and equity allocation.

Compass applies this analysis and invests each client account in accordance with the Investment Plan for that client.

Risk of Loss

While Compass seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

Management Risks. While Compass manages client investment portfolios based on Compass's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Compass allocates assets to asset classes that are adversely affected by unanticipated market movements, and the risk that Compass's specific investment choices could underperform their relevant indexes.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, Compass will invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

Equity Market Risks. Compass may invest portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values

will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

Fixed Income Risks. Compass may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Foreign Securities Risks. Compass may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of Compass or the integrity of Compass' management. Compass has no disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

As noted in ***Item 5 - Fees and Compensation***, Beau Davis is a registered representative of PKS, a FINRA and SIPC member, and registered broker/dealer. Please see ***Item 5 - Fees and Compensation*** for more information.

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

Code of Ethics and Personal Trading

Compass has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Compass's Code has several goals. First, the Code is designed to assist Compass in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, Compass owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires Compass associated persons to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Compass's associated persons (managers, officers and employees). Under the Code's Professional Standards, Compass expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Compass associated persons are not to take inappropriate advantage of their positions in relation to Compass clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time Compass's associated persons may invest in the same securities recommended to clients. Under its Code, Compass has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

Participation or Interest in Client Transactions

Because associated persons may invest in the same securities as those purchased in client accounts, Compass has established a policy requiring its associated persons to pre-clear transactions in these securities with the Chief Compliance Officer. The goal of this policy is to avoid any conflict of interest that may present itself in these situations. Certain securities, such as CD's, treasury obligations and open-end mutual funds are exempt from this pre-clearance requirement. However, in the event of other identified potential trading conflicts of interest, Compass's goal is to place client interests first.

Consistent with the foregoing, Compass maintains policies regarding participation in initial public offerings (IPOs) and private placements in order to comply with applicable laws and avoid conflicts with client transactions. If a Compass associated person wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer. If associated persons trade with client accounts (e.g., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Compass's written policy.

Item 12 - Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, Compass seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, Compass may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Consequently, Compass may not be able to achieve the most favorable execution of transactions and could cost the client more money. Not all investment advisers require or recommend their clients to direct brokerage to a particular broker/dealer. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of Compass's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Compass may recommend that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets. Compass may also affect trades for client accounts at Schwab, or may in some instances, consistent with Compass's duty of best execution and specific agreement with each client, elect to execute trades elsewhere. Although Compass may recommend that clients establish accounts at Schwab, it is ultimately the client's decision to custody

assets with Schwab. Compass is independently owned and operated and is not affiliated with Schwab.

Schwab provides Compass with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as Compass maintains a pre-established minimum amount of client assets in accounts at Schwab Advisor Services. These services are not soft dollar arrangements, but are part of the institutional platform offered by Schwab. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Compass client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab Advisor Services also makes available to Compass other products and services that benefit Compass but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of Compass accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist Compass in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of Compass's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Advisor Services also offers other services intended to help Compass manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Compass. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Compass. Schwab Advisor Services may also provide other benefits such as educational events or occasional business entertainment of Compass personnel. In evaluating whether to recommend that clients custody their assets at Schwab, Compass may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

In addition, Schwab has provided a loan to Advisor to assist its business operations, and the loan is guaranteed by Robert A. Amato and Beau H. Davis, principal(s) of Advisor. The terms of the loan require that management fees to Advisor be paid to an account at Schwab for deduction of interest and principal payments pursuant to the loan before Advisor may have access to that fee payment. The loan agreement contains various representations by Advisor, including that it will maintain \$88 million in assets under management, and various events of default, including that Advisor will comply with all laws, contracts, licenses and permits. In the event of an unheeded default under the terms of the loan agreement, Schwab may terminate and/or accelerate the loan, which may have a

material adverse effect on the Advisor's ability to perform services for you. Some of the products, services and other benefits provided by Schwab, including the Schwab Advisor Business Loan noted above, benefit Advisor and may not benefit Advisor's client accounts. Advisor's recommendation/requirement that a client place assets in Schwab's custody may be based in part on benefits Schwab provides to Advisor, and not solely on the nature, cost or quality of custody and execution services provided by Schwab. Advisor places trades for its clients' accounts subject to its duty to seek best execution and its other fiduciary duties. Advisor may use broker-dealers other than Schwab to execute trades for client accounts maintained at Schwab, but this practice may result in additional costs to clients so that Advisor is more likely to place trades through Schwab rather than other broker-dealers. Schwab's execution quality may be different than other broker-dealers.

Directed Brokerage

Clients may direct Compass to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangement that Compass has with Schwab is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers may in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing Compass to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Compass that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

Aggregated Trade Policy

Compass typically directs trading in individual client accounts as and when trades are appropriate based on the client's Investment Plan, without regard to activity in other client accounts. However, from time to time, Compass may aggregate trades together for multiple client accounts, most often when these accounts are being directed to sell the same securities at the same time. If such an aggregated trade is not completely filled, Compass will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by Compass or its officers, directors, or employees will be excluded first.

Item 13 - Review of Accounts

Managed portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Compass. These factors may include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Robert Amato and Beau Davis, Compass's Managing Partners, review all accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, Compass provides at least an annual report for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at the request of the client. The client should compare any report received from Compass with the statements received direct from the account custodian.

Item 14 - Client Referrals and Other Compensation

As noted above, Compass may receive some benefits from Schwab based on the amount of client assets held at Schwab. Please see ***Item 12 - Brokerage Practices*** for more information. However, neither Schwab nor any other party is paid to refer clients to Compass.

Item 15 - Custody

Schwab is the custodian of nearly all client accounts at Compass. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify Compass of any questions or concerns. Clients are also asked to promptly notify Compass if the custodian fails to provide statements on each account held.

From time to time and in accordance with Compass's agreement with clients, Compass will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting and pending trades.

Item 16 - Investment Discretion

As described above under ***Item 4 - Advisory Business***, Compass manages portfolios on a discretionary basis. This means that after an Investment Plan is developed for the client's investment portfolio, Compass will execute that plan without specific consent from the client for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving Compass the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client; and, the withdrawal of advisory fees directly from the account. Compass then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with Compass and the requirements of the client's custodian. The discretionary relationship is further described in the agreement between Compass and the client.

Item 17 - Voting Client Securities

As a policy and in accordance with Compass's client agreement, Compass does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact Compass with questions relating to proxy procedures and proposals; however, Compass generally does not research particular proxy proposals.

Item 18 - Financial Information

Compass does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.