

Form ADV Part 2A: *Firm Brochure*

Item 1 – Cover Page

Creative Planning Advisor Services, LLC

3400 College Blvd.
Leawood, KS 66211
913-338-2727

www.cpadvisorservices.com

Date of Brochure: February 2015

This brochure provides information about the qualifications and investment advisory business practices of Creative Planning Advisor Services, LLC (also referred to as “CPAS”, we and us throughout this brochure). If you have any questions about the contents of this brochure please contact us at (913) 338-2727 or DeWitt@cpadvisorservices.com. 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

Additional information about CPAS is also available on the SEC’s website at www.adviserinfo.sec.gov. You can view our information on this website by searching for “CPAS Advisor Services, LLC” You can also search using the firm’s CRD number. The CRD number for the firm is 174474.

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

Item 2 – Material Changes

Creative Planning Advisor Services, LLC is a newly registered investment advisor, and this disclosure brochure dated February 2015 is the first disclosure brochure prepared by our firm. In the future, this item will discuss only specific material changes that are made to the disclosure brochure and provide readers with a summary of such changes. We will also reference the date of the last annual update of this disclosure brochure.

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

Item 3 – Table of Contents

Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Description of Advisory Firm	4
Private Wealth Management	5
Qualified and ERISA Plan Consulting Services	6
Limits Advice to Certain Types of Investments	8
Tailor Advisory Services to Individual Needs of Clients	9
Client Assets Managed by CPAS	9
Item 5 – Fees and Compensation	9
Fees for Private Wealth Management	9
Fees for Qualified and ERISA Plan Consulting	10
Item 6 – Performance-Based Fees and Side-By-Side Management	11
Item 7 – Types of Clients	11
Minimum Investment Amounts Required	11
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	11
Item 9 – Disciplinary Information	14
Item 10 – Other Financial Industry Activities and Affiliations	14
Creative Planning, Inc.	14
Insurance Activities through Creative Planning Risk Management, Creative Planning Benefits, and	
Creative Planning Risk Services	14
Legal Activities - The Will & Trust Center	15
Creative Planning TPA Services, LLC	15
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading	16
Code of Ethics Summary	16
Participation or Interest in Client Transactions	16
Item 12 – Brokerage Practices	16
Recommendation of Broker/Dealers and Custodians	16
Arrangements with TD Ameritrade	17
Brokerage for Client Referrals	19
Arrangements with Schwab	19
Trading Policy	20
Item 13 – Review of Accounts	20
Account Reviews and Reviewers	20
Statements and Reports	21
Item 14 – Client Referrals and Other Compensation	21
Other Compensation	21
Client Referrals	21
Item 15 – Custody	22
Item 16 – Investment Discretion	22
Item 17 – Voting Client Securities	23
Item 18 – Financial Information	23
CUSTOMER PRIVACY POLICY NOTICE	24

Item 4 – Advisory Business

Description of Advisory Firm

Creative Planning Advisor Services, LLC (“CPAS”) is an investment advisor firm registered with the United States Securities and Exchange Commission (“SEC”) and is a limited liability company formed under the laws of the State of Kansas.

- The firm has been in business and registered as an investment advisor with the SEC since February 2015.
- Peter Mallouk is the controlling owner of the firm.

CPAS was created in November 2014 as a spin off from our affiliated investment advisory firm, Creative Planning, Inc. Creative Planning, Inc. was originally founded in 1983. In February 2015, CPAS registered as an investment advisor firm with the SEC to offer a turnkey asset management program so that many of the same services, tools and strategies used by Creative Planning, Inc. could be offered to other registered investment advisory firms and their clients.

If you have received this disclosure brochure, it is because your investment advisor firm has recommended CPAS as a third-party investment advisor firm to manage all or a portion of your investable assets and provides other investment advisory services as described in this brochure. We also provide a suite of services to registered investment advisory firms, including your investment advisor firm that include, but are not necessarily limited to the following:

- Investment advisor firm start-up and existing investment advisor firm transition support
- Business Development Custodian and Back-office Operations Support; Back-Up of Disaster Recovery for Books and Records
- Technology Solutions Support
- Compliance Program Support
- Billing and Reporting Platform: Calculation, Collection, Reconciliation and Remittance of Fees; Custodian Data Reconciliation; Electronic Delivery of Quarterly Performance Reporting
- Practice Management Strategy and Ongoing Best Practices Coaching
- Professional Development Training on various investment and practice management topics; Ongoing Continuing Education Credit Opportunities
- Continuity & Succession Planning Solutions

It is important that you read the information contained within this disclosure brochure carefully and speak with your investment advisor (who we also refer to as “Introducing Advisor” throughout this brochure) if you have any questions about our services or arrangements.

Please understand that a written agreement, which details the exact terms of service, must be signed by you and CPAS before we can provide you the services described below.

We work with your Introducing Advisor to provide a multitude of services to you and your Introducing Advisor. Because your Introducing Advisor will be your primary point of contact all applicable contracts and account paperwork will be completed with the assistance of your Introducing Advisor. The Introducing Advisor will obtain your necessary financial data, assist you in determining suitability, and help determine appropriate investment objectives. Your Introducing Advisor will then provide all necessary information to CPAS. Your Introducing Advisor will meet with you periodically to review your financial situation, investment objectives, and current portfolios and then make any necessary changes to

the portfolio strategy selection, notice of which will be sent to CPAS. Your Introducing Advisor will be responsible for providing a copy of this disclosure brochure.

Private Wealth Management

Portfolio Management Services

Private Wealth Management service can be best described as giving continuous investment advice to a client and making investments for the client based on the individual needs of the client. Through this service, we offer a highly customized and individualized investment program for each client. A specific investment strategy is crafted to focus on the specific client's goals and objectives.

We provide our Private Wealth Management service through accounts maintained at a qualified custodian recommended by CPAS (please refer to Item 15 – Custody for more information). Qualified custodians include registered broker/dealers, banks offering trust services and variable annuity product sponsors. We are also able to manage retirement and variable annuity accounts held at select broker/dealers and qualified custodians, conditional upon availability. As a condition of this program CPAS will be granted discretionary trading authorization on the client's account. This enables us to move client funds among stocks, bonds, ETFs, mutual funds or other investments at our discretion (please refer to Item 16 – Investment Discretion for more information).

You are always responsible for notifying your Introducing Advisor of any changes to your financial situation or investment objectives. Our Wealth Managers are reasonably available to consult with you or your Investment Advisor relative to the status of your accounts under our management. Your beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents your direct and beneficial interest in the securities which comprise your accounts. A separate account is always maintained for every client with the broker-dealer/custodian and you retain all rights of ownership to your accounts (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

Administrative Services Provided by ORION Advisor Services, LLC

CPAS has contracted with and pays ORION Advisor Services, LLC (referred to as "ORION") to utilize its technology platforms to support data reconciliation, performance reporting, fee calculation and billing, research, client database maintenance, quarterly performance evaluations, payable reports, web site administration, models, trading platforms, and other functions related to the administrative tasks of managing client accounts. Due to this arrangement, ORION will have access to client accounts, but ORION will not serve as an investment advisor to CPAS clients. CPAS and ORION are not affiliated companies.

Financial Planning Services

As part of our services, we will work with your Introducing Advisor to help develop and provide financial planning services under several formats at your specific direction. We do not charge separate or additional fees for financial planning as all services are covered under the standard asset management fee described in Item 5.

Financial planning services may be specific or modular in their preparation (unique to each client in their depth of preparation). Topics included as part of the financial planning services may include, but are not necessarily limited to, the following:

1. Organization and assessment

2. Retirement planning
3. Education planning
4. Long-term care
5. Insurance planning
6. Debt management
7. Investments
8. Tax planning
9. Estate planning
10. Life events

Your Introducing Advisor will interview and consult with you to determine your personal financial situation and objectives and to analyze your financial documentation. As applicable, we then work with your Introducing Advisor to review your assets and liabilities, investment portfolio, retirement plan, education plan, risk management plan, risk tolerance, and estate plan, as well as other areas relevant to the client's financial health. We work with your Introducing Advisor to provide an executive summary, highlighting the plan of action.

Your Introducing Advisor will meet with you to explain the financial plan and our recommendations. Furthermore, we are available to work with you throughout the year to implement the plan. Annually, the plan is updated to take into account changes in the client's financial situation as well as changes in the investment markets, tax laws, estate planning laws, and so on. You are ultimately responsible for communicating changes in circumstances to your introducing advisor and CPAS so that we can provide the most accurate advice and counsel possible. Our Wealth Managers are available year round to assist with the implementation of the plan and to answer any client questions, but you are ultimately responsible for the implementation or rejection of our recommendations. This means you are never obligated or required to implement our recommendations.

Qualified and ERISA Plan Consulting Services

In addition to the services described above, we also provide qualified and ERISA retirement plan consulting services. These services may involve:

1. Fiduciary Consulting Services

1. Recommendations regarding investment selection consistent with ERISA section 404(c).
2. Ability to consult on a one-on-one basis with Plan Participants

CPAS acknowledges that it is performing Fiduciary Consulting Services listed above that it is acting as a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of Employee Retirement Income Security Act of 1974 ("ERISA") for purposes of providing non-discretionary investment advice only. CPAS will act in a manner consistent with the requirements of a fiduciary under ERISA if, based upon the facts and circumstances, such services cause CPAS to be a fiduciary as a matter of law. However, in providing the Fiduciary Consulting Services, CPAS (a) has no responsibility and will not (i) exercise any discretionary authority or discretionary control respecting management of the client's retirement plan, (ii) exercise any authority or control respecting management or disposition of assets of the client's retirement plan, or (iii) have any discretionary authority or discretionary responsibility in the administration of the client's retirement plan or the interpretation of the client's retirement plan documents, (b) is not an "investment manager" as defined in Section 3(38) of ERISA and does not have the power to manage, acquire or dispose of any plan assets, and (c) is not the "Administrator" of the client's retirement plan as defined in ERISA.

2. Non-Fiduciary Consulting Services

CPAS provides clients with the following Non-Fiduciary Retirement Plan Consulting Services:

- Investment Education. The following services will not take into account the individual circumstances of each participant and individual recommendations will not be provided unless otherwise agreed upon. Plan participants are responsible for implementing transactions in their own accounts. Under no circumstances will CPAS implement transactions in the individual Plan participant accounts.
 - Educational presentations for Plan participants. Presentations to Plan participants are informational in nature and intended to provide an overview of the Plan and the Plan's investment selections.
 - Asset Allocation Models.
 - Interactive Investment Materials.

Although an investment advisor is considered a fiduciary under the Investment Advisers Act of 1940 and required to meet the fiduciary duties as defined by the Advisers Act, the services listed above as non-fiduciary should not be considered fiduciary services for the purposes of ERISA since Advisor is not acting as a fiduciary to the Plan, as the term "fiduciary" is defined in Section 3(21)(A)(ii) of ERISA.

The exact suite of services provided to a client will be listed and detailed in the agreement for services.

Clients that elect to engage our firm for this service are required to also work with CPAS to be a service provider to the plan.

As a service provider, we will be responsible for all aspects of the management of the 401(k) plan. Specifically, we provide the following non-investment related services; annual plan review, Plan Demographic Review, Legislative Review and Impact, 404(c) Policy Statement, Plan Vendor Contract Service and Pricing Negotiation, Plan Design Review, Enrollment Meetings, Employer Newsletters, Periodic Sample Employee Memos, ERISA Legal Support & Compliance Assistance, 401(k) Help E-Mail & Toll-Free 800 Number for Employees, Vendor Analysis/Selection/Monitoring, and Plan Conversion Management.

To help control for the potential conflict of interest of using CPAS as both a service provider and investment advisor, we conduct periodic reviews of fees charged by other firms providing similar pension consulting services as CPAS. This is done to demonstrate that fees charged by CPAS are reasonable compared to other companies.

If you, or your company sign up for this service, please understand that you will be ultimately responsible for implementing all recommendations provided by CPAS. Client funds and assets will be held with a third-party broker/dealer that will serve as the client's qualified custodian. CPAS will NOT have a limited power of attorney to execute transactions on behalf of the client. Therefore, we will NOT submit trade instructions to the designated third-party administrator. All changes to Plan holdings and investment selections are the client's responsibility.

If you decide to pick the service option for one-on-one consulting services between CPAS and Plan Participants, such services are consulting in nature and do not involve CPAS implementing recommendations in individual participant accounts. It will be the responsibility of each Participant to implement changes in their individual accounts.

CPAS will disclose, to the extent required by ERISA Regulation Section 2550.408b-2(c), to you any change to the information that we are required to disclose under ERISA Regulation Section 2550.408b-2(c)(1)(iv) as soon as practicable, but no later than sixty (60) days from the date on which we are informed of the change (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable).

In accordance with ERISA Regulation Section 2550.408b-2(c)(vi)(A), we will disclose within thirty (30) days following receipt of a written request from the responsible plan fiduciary or Plan Administrator (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable) all information related to the Qualified Retirement Plan Consulting Agreement and any compensation or fees received in connection with the Agreement that is required for the Plan to comply with the reporting and disclosure requirements of Title 1 of ERISA and the regulations, forms and schedules issued thereunder.

If we make an unintentional error or omission in disclosing the information required under ERISA Regulation Section 2550.408b-2(c)(1)(iv) or (vi), we will disclose to you the correct information as soon as practicable, but no later than thirty (30) days from the date on which we learn of such error or omission.

Limits Advice to Certain Types of Investments

We provide investment advice on the following types of investments.

- Exchange-listed securities (i.e. stocks)
- Securities traded over-the-counter (i.e. stocks)
- Foreign Issues
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States government securities
- Options contracts on securities
- Interests in partnerships investing in real estate
- Options contracts
- Futures contracts
- Oil and gas interests

When providing Portfolio Management Services, the firm will typically construct each client's account holdings using bonds, equities, ETFs, and mutual funds to build diversified portfolios. It is not CPAS's typical investment strategy to attempt to time the market but we may increase cash holdings as deemed appropriate, based on your risk tolerance and short and long term goals. We may modify our investment

strategy to accommodate special situations like: low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

Tailor Advisory Services to Individual Needs of Clients

Our services are provided based on the individual needs of each client. This means, for example, that you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with clients on a one-on-one basis through interviews and questionnaires to determine the client's investment objectives and suitability information.

Client Assets Managed by CPAS

As a newly registered investment advisor, CPAS has no assets under management to report as of the date of this Brochure (February 2015).

Item 5 – Fees and Compensation

In addition to the information provide in Item 4 – Advisory Business, this section provides details regarding CPAS's services along with descriptions of each service's fees and compensation arrangements.

Fees for Private Wealth Management

CPAS charges an annual percentage-based fee for Private Wealth Management which covers both our Portfolio Management Services and Financial Planning Services. The annual fee is based on the fair market or agreed upon value of the client's account assets determined as of the last business day of each calendar quarter. Annual fees are divided and payable quarterly in arrears. The following is a sample fee schedule provided for illustrative purposes.

Annual Fee Calculation

1.20% on the first \$500,000
1.00% on assets of \$500,001 – 2,000,000
.85% on assets of \$2,000,001 – \$5,000,000
.80% on assets of \$5,000,001 - \$10,000,000
.70% on assets of \$10,000,001 - \$25,000,000
.40% on assets of \$25,000,001 - \$50,000,000
.30% on assets of \$50,000,001 - \$75,000,000
.25 % on assets of \$75,000,001 - \$100,000,000

- Different advisor representatives may maintain higher minimums

The fee schedule detailed above represents the total investment advisory fees charged to your assets and divided between CPAS and your Introducing Advisor. CPAS generally retains no more than 45 basis points (.45%) of the fee with your Introducing Advisor receiving the difference.

CPAS calculates the management fee against all assets in your investment accounts under our management, unless specifically excluded. Therefore fee calculations include cash balances invested in money market funds, short-term investment funds, ETFs, mutual funds, and all other investment holdings.

The exact services and fees will be agreed upon and disclosed in the agreement for services prior to services being provided.

In limited and unique circumstances, fees may be negotiable based on factors such as the client's financial situation and circumstances, the amount of assets under management, and the overall complexity of the services provided.

Fees are generally deducted directly from one or more of your accounts. When fees are deducted from your account(s), you will need to provide the custodian with written authorization to have fees deducted from the account and paid to CPAS. The custodian will send client statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee, if deducted directly from the account (please refer to Item 13 – Review of Accounts for more information regarding client statements).

Brokerage fees and/or transaction ticket fees charged by the custodian will be billed directly to each client's account. We do *not* receive any portion of such commissions or fees from the custodian or from clients. Management fees charged by CPAS are separate and distinct from the fees and expenses charged by mutual funds, exchange traded funds or investment company securities that may be recommended to clients. A description of these fees and expenses are available in each investment company security's prospectus.

Portfolio management services may be terminated at any time without penalty. If services are terminated during a quarter, fees due are pro rated based on the period CPAS managed the assets prior to termination. The date of termination will be used to calculate the final fee payment.

Fees for Qualified and ERISA Plan Consulting

Clients pay one fee to Creative Planning TPA Services for this service that covers the services provided by Creative Planning TPA Services and the investment management services provided by CPAS, a portion of which is paid to your Introducing Advisor. The actual fee charged to each client will be determined with the client and detailed in the agreement for services. Annual fees are divided into quarterly payments and billed to the client on a quarterly basis. Fees are due upon the client's receipt of the billing notice. For asset based fees, the fee will be calculated quarterly and based on the value of the Plan's assets at the end of each quarter. Annual fixed fees are divided into equal quarterly payments. When fees are based on the total market value of the Plan, the fee shall not exceed 1.00% annually of the Plan's value. The maximum annual fixed fee shall not exceed \$100,000.

Certain expenses incurred by Creative Planning TPA Services or CPAS in order to perform the agreed upon Plan services will be considered outside of the standard fee for services described above and will be billed directly to client in addition to the agreed upon service fee indicated. Any outside expenses that clients may be responsible for will be described in the agreement for services.

In addition to the fees paid directly to Creative Planning TPA Services, the client will also incur charges imposed at the mutual fund or exchange traded fund level (e.g., advisory fees and other fund expenses) and charges imposed by the Plan custodian. Brokerage commissions and/or transaction ticket fees charged by the custodian will be billed directly to the client by the custodian. We do not receive any portion of such brokerage commissions or transaction fees from the custodian or clients. Our fees are separate and distinct from the fees and expenses charged by investment company securities that may be

recommended to clients. A description of these fees and expenses are available in each investment company security's prospectus.

Either party (i.e. the client or our Firm) may terminate the agreement for services with 30 days written notice to the other party. A refund of any unearned fees will be made based on the time expended by Creative Planning TPA Services and CPAS before termination. A full refund of any fees paid will be made if the agreement is terminated within five business days. When fees are billed in arrears, the client will be responsible for paying the final fee on a pro-rated basis.

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

Item 6 of the Form ADV Part 2 instructions is not applicable to this Disclosure Brochure because CPAS does not charge or accept performance-based fees which can be defined as fees based on a share of capital gains on or capital appreciation of the assets held within a client's account.

Item 7 – Types of Clients

CPAS generally provides investment advice to the following types of clients:

- Individuals,
- Pension and profit sharing plans
- Trusts, estates or charitable organizations
- Corporations or business entities other than those listed above

Minimum Investment Amounts Required

CPAS requires an initial minimum investment of \$250,000 to provide portfolio management services. CPAS may waive the minimum account values at its discretion.

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

CPAS uses the following methods of analysis in formulating investment advice.

Cyclical - Analyzes the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins, and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

While most economists and investors agree that there are cycles in the economy that need to be respected, the duration of such cycles is generally unknown. An investment decision to buy at the bottom of a business cycle may actually turn out to be a trade that occurs before or after the bottom of the cycle.

If done before the bottom, then downside price action can result prior to any gains. If done after the bottom, then some upside price action may be missed. Similarly, a sell decision meant to occur at the top of a cycle may result in missed opportunity or unrealized losses.

Fundamental - A method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors

(like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

CPAS uses the following investment strategies when managing client assets and/or providing investment advice.

- Long term purchases which are investments held at least a year.
- Short term purchases which are investments sold within a year.
- Trading which involve investments sold within 30 days.
- Short sales. A short sale is generally the sale of a stock not owned by the investor. Investors who sell short believe the price of the stock will fall. If the price drops, the investor can buy the stock at the lower price and make a profit. If the price of the stock rises and the investor buys it back later at the higher price, the investor will incur a loss. Short sales require a margin account.
- Margin transactions. When an investor buys a stock on margin, the investor pays for part of the purchase and borrows the rest from a brokerage firm. For example, an investor may buy \$5,000 worth of stock in a margin account by paying for \$2,500 and borrowing \$2,500 from a brokerage firm. Clients cannot borrow stock from CPAS.
- Option writing including covered options, uncovered options, or spreading strategies. Options are contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time.

Risk of Loss

Clients must understand that past performance is not indicative of future results. Therefore, current and prospective clients (including you) should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, my firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There

are certain additional risks associated when investing in securities through my investment management program.

- Market Risk – Either the stock market as a whole or the value of an individual company as a result of moves in the overall market goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When we invests in a an ETF or mutual fund for a client, the client will bear additional expenses based on its pro rata share of the ETFs or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with my firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

This item is not applicable to our brochure because there are no legal or disciplinary events listed at Item 9 of the Form ADV Part 2 instructions that are material to a client's or prospective client's evaluation of my business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

CPAS is an independent investment advisory firm and only provides investment advisory services. The firm is not engaged in any other business activities and offers no other services than those described in this Disclosure Brochure.

CPAS is not and does not have a related company that is a (1) broker/dealer, municipal securities dealer, government securities dealer or broker, (2) investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), (3) futures commission merchant, commodity pool operator, or commodity trading advisor, (4) banking or thrift institution, (5) real estate broker or dealer, or (6) sponsor or syndicator of limited partnerships.

Our investment advisor representatives are not affiliated (which means registered or employed) with a broker/dealer or commodities and futures trading firm.

Although CPAS does not provide any other services and is not involved in any other business activities, it does have related companies engaged in other activities and some of the firm's management personnel work for the related companies.

Creative Planning, Inc.

CPAS is under common ownership with another investment advisor firm, Creative Planning, Inc. CPAS is registered with the SEC, relying on Rule 203A-2(c) under the Investment Advisers Act of 1940, because CPAS is under common control with Creative Planning, Inc., an investment advisor that is registered with the SEC, and the CPAS principal office and place of business is the same as Creative Planning, Inc.

We share investment advisory personnel with Creative Planning, Inc. Thus, the investment strategies and recommendations provided by CPAS are very similar to Creative Planning, Inc. Clients that work with Creative Planning, Inc. directly may pay a higher or lower fee than clients working with CPAS and their Introducing Advisor. However, Creative Planning, Inc. retains a higher overall fee for its services than does CPAS for its services because CPAS shares a large percentage of its management fees with Introducing Advisors. Therefore, a potential conflict of interest exists between our interests and the interests of our clients in that we may be more attentive to clients of Creative Planning, Inc. However, generally speaking, the types of investment recommendations and methods of formulating investment advice for Creative Planning, Inc. clients are the same as those provided to CPAS clients. In addition CPAS clients work with their Introducing Advisors directly.

Insurance Activities through Creative Planning Risk Management, Creative Planning Benefits, and Creative Planning Risk Services

CPAS has three related insurance agencies.

- Creative Planning Risk Management provides individual life, disability and long term care coverage through various insurance companies.
- Creative Planning Benefits provides group health benefits through various insurance companies.
- Creative Planning Risk Services provides property and casualty coverage.

Clients of CPAS may be referred to a related insurance agency. CPAS does not receive a referral fee; however, some of CPAS's personnel that are insurance agents may receive commissions for the sale of insurance products. The receipt of insurance commissions is in addition to any advisory fees charged by CPAS.

Clients are never obligated or required to purchase insurance products from one of our affiliated insurance companies and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale. Please refer to Item 14 – Client Referrals and Other Compensation for more information regarding the insurance commissions received by our affiliated insurance companies and the conflicts such compensation presents.

Legal Activities - The Will & Trust Center

CPAS is under common ownership with a law firm, Mallouk Law Firm, PA, doing business under the name The Will & Trust Center. Peter Mallouk is the majority owner and also a practicing attorney with The Will & Trust Center. He spends approximately 2 hours per month on the law practice.

Clients of CPAS may be referred to The Will & Trust Center for estate planning and other legal services. Due to the fact that they are related entities, both firms have an economic incentive to refer clients to each other in lieu of referring clients to other law firms or financial professionals. In addition, CPAS pays The Will & Trust Center a referral fee of up to 20 basis points (0.20%) of the total fee charged by CPAS to the client (please refer to Item 14 – Client Referrals and Other Compensation).

Although we recommend you use the services of The Will & Trust Center, you are never obligated or required to use their services. There are other law firms that provide legal services similar to those provided by The Will & Trust Center and may provide such services for less expensive rates. Whenever we recommend The Will & Trust Center, you are encouraged to consider other law firms too.

The services of CPAS and The Will & Trust Center are separate and distinct from one another, each with a separate compensation arrangement typical for the services rendered.

Creative Planning TPA Services, LLC

Administration and record keeping services for qualified retirement plans can be provided for by Creative Planning TPA Services, LLC. Clients of Creative Planning TPA Services, LLC will be provided a plan document, participant support, and website for initiating transactions. Year end discrimination testing, Form 5500 preparation as well as other services outlined in the Administrative Services Agreement will be provided to administer the clients' retirement program. Creative Planning TPA Services, LLC is a joint venture with TPP Retirement Plan Specialist, LLC. A separate entity is selected to act as the custodian to execute trades placed over the website. TD Ameritrade Trust Company is the preferred custodian of Creative Planning TPA Services, LLC due to their ability to maintain a daily valued platform with a direct link to trades placed online.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

CPAS has established a Code of Ethics that applies to all employees of CPAS and is designed to, among other things; govern personal securities trading activities in the accounts of employees. The Code is based upon the principle that CPAS and its employees owe a fiduciary duty to CPAS's clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards long maintained by CPAS continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee. This section is intended to be a summary of the CPAS code of ethics. Clients may receive a complete copy of the code of ethics upon request.

Participation or Interest in Client Transactions

CPAS and its associated persons may buy or sell securities that are also recommended to clients. Securities recommended by CPAS are widely held and publicly traded. In addition, in accordance with its fiduciary duty to clients, CPAS and its associated persons will place client interests ahead of their own interests. Finally, we have developed policies and procedures under our Code of Ethics that require our employees to submit their personal securities holdings and transactions to our Firm. This is done so that we may monitor their investments to ensure compliance with our Code of Ethics and our general fiduciary duty to clients.

Item 12 – Brokerage Practices

Recommendation of Broker/Dealers and Custodians

You are under **no** obligation to act on the recommendations of CPAS and are free to select any broker/dealer or investment advisor you'd like to implement our recommendations. In other words, you are *not required* to work with us. However, if you want to hire us for our Private Wealth Management service, we will be responsible for executing your account transactions and therefore responsible for attaining the best execution possible. Please note that we cannot promise or guarantee our brokerage platforms are the least expensive in the industry. There may be other platforms with lower costs.

For clients that open portfolio management accounts through CPAS, we will recommend the use of a particular broker/dealer. We recommend TD Ameritrade or Charles Schwab & Company, Inc. to serve as the clearing broker/dealer and custodian.

Please note that not all investment advisors recommend or require the use of particular broker/dealers. Some investment advisors permit client to use any broker/dealer of the client's own choosing. In very rare cases, we may work with a client that wants to direct us to use a particular broker/dealer for standard brokerage accounts. In such cases, those clients must understand that we may be unable to effectively negotiate brokerage compensation on the client's behalf. When directing brokerage business, clients should consider whether the commission expenses and execution, clearance and settlement capabilities that they will obtain through their selected broker/dealer(s) are adequately favorable in comparison to those that we would otherwise obtain for our clients. Clients with client-directed brokerage arrangements should also understand we may be limited in our trading ability (compared to platforms recommended by

CPAS) and may be required to execute client directed trades after trades are implemented through accounts at our preferred platforms. Clients are encouraged to discuss available alternatives with their advisor representative.

In addition, we may also render investment management services to clients regarding their (1) variable life/annuity products that they may own, and/or (2) their individual employer-sponsored retirement plans. In these situations, CPAS either directs or recommends the allocation of client assets among the various mutual fund subdivisions that comprise the variable life/annuity product or the retirement plan. The client assets shall be maintained at either the specific insurance company that issued the variable life/annuity product which is owned by the client or at the custodian designated by the sponsor of the client's retirement plan. We do not have any arrangements whereby we recommend specific variable annuity sponsor companies or retirement plan sponsors.

Arrangements with TD Ameritrade

The recommendation of TD Ameritrade and any other broker/dealer is based on past experiences, minimizing commissions and other costs as well as offerings or services the broker/dealer provides that CPAS or client may require or find valuable such as online access. Clients may pay commissions higher than those obtainable from other broker/dealers in return for those products and services. Commission and fee structures of various broker/dealers are periodically reviewed to ensure clients are receiving best execution. Accordingly, while CPAS will consider competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. Therefore, the overall services provided by the broker/dealer are evaluated to determine best execution.

Although we consider the overall services provided by TD Ameritrade and factor the benefits provided to our clients, we have material arrangements with the TD Ameritrade that create an incentive for us to recommend TD Ameritrade over other broker/dealers. Some of the arrangements may result in conflicts of interest with our clients and are explained in the following sections.

CPAS participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. CPAS receives some benefits from TD Ameritrade through its participation in the program.

While there will not be a direct linkage between the investment advice provided by CPAS and the broker/dealers it recommends, economic benefits may be received that would not be received if CPAS did not use these services to implement the investment advice provided. These benefits may include, but not necessarily be limited to: receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to CPAS by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by CPAS's related persons and may also pay or reimburse expenses (including travel, lodging, meals and entertainment expenses) for CPAS's personnel to attend conferences or meetings relating to the program

or to TD Ameritrade's advisor custody and brokerage services generally. Some of the products and services made available by TD Ameritrade through the program may benefit CPAS but may not benefit its client accounts. These products or services may assist CPAS in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help CPAS manage and further develop its business enterprise. The benefits received by CPAS or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, CPAS endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by CPAS or its related persons in and of itself creates a potential conflict of interest and may indirectly influence CPAS's choice of TD Ameritrade for custody and brokerage services.

TD Ameritrade's iRebal Service

In selecting TD Ameritrade, CPAS takes into consideration its arrangement to obtain price discounts for TD Ameritrade's automatic portfolio rebalancing service for investment advisors known as "iRebal".

TD Ameritrade has agreed to provide the service at no additional cost because of CPAS's decision to maintain an agreed upon amount of client taxable assets on the TD Ameritrade platform. There are some client assets that are non-taxable assets and are excluded from the maintenance and commitment levels required. Excluded assets are "plan assets" of plans subject to Title 1 of the Employee Retirement Income Security Act of 1974, amended, or of plans as defined in Section 4975 of the Internal Revenue Code (which include IRAs).

If CPAS does not maintain the relevant level of taxable assets on the TD Ameritrade platform, CPAS may be required to make a penalty fee payment to TD Ameritrade calculated on the basis of the shortfall.

Although CPAS believes that the products and services offered by TD Ameritrade are competitive in the market place for similar services offered by other broker-dealers or custodians, the arrangement with TD Ameritrade as to the iRebal service may affect CPAS's independent judgment in selecting or maintaining TD Ameritrade as the broker or custodian for client accounts.

Additional Services Agreement

Through our affiliated firm, Creative Planning, Inc., we receive from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment advisors participating in TD Ameritrade's Institutional program. Specifically, the Additional Services include TD Ameritrade making available to CPAS the portfolio account services provided by ORION Advisor Services, LLC. Please refer to Item 4 of this brochure for details of the services provided by ORION Advisor Services, LLC.

TD Ameritrade provides the Additional Services to CPAS in its sole discretion and at its own expense, and CPAS does not pay any fees to TD Ameritrade for the Additional Services. CPAS and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

CPAS's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to CPAS, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, CPAS's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with CPAS, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, CPAS may have an incentive to recommend to its Clients that the assets under management

by CPAS be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. CPAS's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including seeking best execution of trades for Client accounts.

Brokerage for Client Referrals

Another material arrangement with TD Ameritrade is the fact our affiliated firm, Creative Planning, Inc., receives client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect (the "referral program"). In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, Creative Planning, Inc. was selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with Creative Planning, Inc. and CPAS and there is no employee or agency relationship between us. TD Ameritrade has established the referral program as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise Creative Planning, Inc. or CPAS and has no responsibility for CPAS's management of client portfolios or CPAS's other advice or services. Clients referred by TD Ameritrade will work with Creative Planning, Inc. and not CPAS. Creative Planning, Inc. pays TD Ameritrade an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25% in the AdvisorDirect program, but Creative Planning, Inc. has negotiated a fee not to exceed 25% with TD Ameritrade) of the advisory fee that the client pays to Creative Planning, Inc. ("Solicitation Fee").

Creative Planning, Inc. will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by Creative Planning, Inc. from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired Creative Planning, Inc. on the recommendation of such referred client. Creative Planning, Inc. will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients.

Creative Planning, Inc.'s participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, Creative Planning, Inc. may have an incentive to recommend to clients that the assets under management by Creative Planning, Inc. be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, Creative Planning, Inc. has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. Creative Planning, Inc.'s participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

Arrangements with Schwab

CPAS may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although CPAS may recommend the clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. CPAS is independently owned and operated and not affiliated with Schwab. CPAS may recommend additional unaffiliated broker-dealers to affect fixed income transactions.

Schwab provides CPAS 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 a total of at least \$10 million of the advisor's clients' assets are maintained at Schwab Institutional. These services are not contingent upon CPAS committing to Schwab any specific amount of business (assets in custody or trading commissions). 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 significantly higher minimum initial investment.

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

Schwab's products and services that assist CPAS in managing and administering clients' accounts include software and other technology that (i) provides 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 CPAS's fees from some of its accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Trading Policy

Our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Further, the investments we are responsible for trading in client accounts are typically limited to mutual funds, ETFs, and other broadly traded positions. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Reviews of clients' portfolios are conducted daily to assure proper credits and debits and related matters. CPAS reviews client accounts in their entirety on a quarterly basis to determine any readjustment of assets according to CPAS's active asset allocation model. Portfolios are also reviewed on an informal and periodic basis as needed or requested. One of our Wealth Managers will be the primary person responsible for reviewing your individual accounts managed by CPAS. Your Investment Advisor will also monitor your accounts and is available to speak with you when necessary.

Clients are contacted annually regarding the financial planning update. Financial plans are updated more frequently than annually at the client's request.

Comprehensive financial planning is included as part of the CPAS Private Wealth Management service. The financial plan includes a Net Worth Statement, retirement projections, education projections, asset allocation analysis and recommendations, diversification recommendations, a risk tolerance assessment,

a risk management review, an estate planning review, as well as additional issues. CPAS reviews a client's financial situation in detail. Similar to reviews of investment management accounts, your investment advisor representative is the primary person responsible for preparing and updating financial plans, but can seek the assistance of other advisory personnel when needed. You can call, e-mail or schedule in-person meetings with your investment advisor representative as often as needed.

Statements and Reports

For clients with accounts managed through our Portfolio Management Services, we make available quarterly written reports which are prepared and distributed by ORION Advisor Services, LLC (please refer to Item 5 – Fees and Compensation for a description of ORION's services and our arrangement with their firm). The reports include current holdings, current asset allocations, performance, and other relevant information. Reports are made available to your Introducing Advisor who may or may not decide to make them available to you. Therefore, some clients will receive reports and some clients will not. You should check with your Introducing Advisor to find out if you will receive reports.

In addition, you receive account statements directly from the custodian holding the client's account(s). Account statements are delivered at least quarterly. You are urged to compare the reports and statements provided by CPAS against the account statements delivered directly from the custodian.

Item 14 – Client Referrals and Other Compensation

Other Compensation

CPAS's related persons that are insurance agents and insurance agencies receive commissions and other incentive awards for the recommendation/sale of insurance products. The receipt of this compensation may affect the judgment of CPAS's related persons when recommending products to its clients. While CPAS's related persons endeavor at all time to put the interest of the clients first as a part of CPAS's fiduciary duty, clients should be aware that the receipt of commission and additional compensation itself creates a conflict of interest, and may affect the judgment of insurance agents when making insurance product recommendations.

Please refer to Item 12 – Brokerage Practices for a description of the various other economic benefits received through our brokerage arrangements.

Client Referrals

As a third-party investment advisor providing asset management services, CPAS relies exclusively on client referrals from unaffiliated investment advisors and their representatives ("Introducing Advisors"). Details of the compensation provided to Introducing Advisors that refer clients to CPAS are provided at Item 5 of this brochure. All of our arrangements with Introducing Advisors are in compliance with federal or state regulations (as applicable). All fees are paid pursuant to a written agreement retained by both CPAS and the Introducing Advisor.

Introducing Advisors are required to provide clients with several documents, including a copy of this Form ADV Part 2 Disclosure Brochure and a Solicitor Disclosure Document prior to or at the time of entering into any investment advisory contract with CPAS.

Clients that engage CPAS will pay more or less to obtain CPAS's investment management services than do clients of our affiliated firm, Creative Planning, Inc., due to the difference in fees agreed upon between clients and their Introducing Advisors.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

CPAS is deemed to have custody of client funds and securities whenever the firm is given the authority to have fees deducted directly from client accounts.

For accounts in which CPAS or its related companies is deemed to have custody, the firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from CPAS. When clients have questions about their account statements, they should contact us or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

Upon receiving written authorization from the client in our standard client agreement, CPAS provides discretionary investment advisory services for client accounts. When discretionary authority is granted, CPAS will have the authority to determine the type of securities and the amount of securities that can be bought or sold for the client portfolio without obtaining the client's consent for each transaction.

CPAS may elect to purchase bonds through bond brokers in order to obtain a better price for the client and then have the bonds delivered into the client's brokerage account. This practice is called "trading away". This is the only case in which CPAS selects a broker to be used without specific client consent. The client's primary broker/dealer-custodian typically charges the client a transaction fee for "trading away" through other brokers.

In very limited situations, a client may be allowed to grant trading authorization on a non-discretionary basis. In these cases, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, CPAS will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if you are not able to be reached or are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

All clients have the ability to place reasonable restrictions on the types of investments that may be purchased in an account. Clients may also place reasonable limitations on the discretionary power granted to our firm so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Item 17 – Voting Client Securities

CPAS does **not** vote proxy on behalf of clients. It shall be the client's ultimate responsibility to select and make all proxy voting decisions. While there are some investment advisors that will vote proxies and other corporate decisions on behalf of their clients, CPAS has determined that taking on the responsibility for voting client securities does not add enough value to the services provided to clients to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in accounts managed by CPAS firm.

Clients will receive proxies directly from their custodian or transfer agent and such documents will not be delivered by CPAS. Although CPAS does not vote client proxies, if you have a question about a particular proxy feel free to contact CPAS.

Item 18 – Financial Information

This item is not applicable to this brochure. CPAS does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, CPAS is not required to include a balance sheet for my most recent fiscal year. CPAS is not subject to a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Finally, CPAS has not been the subject of a bankruptcy petition at any time.

CUSTOMER PRIVACY POLICY NOTICE

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. CPAS does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

Commitment to Your Private Information. CPAS is committed to safeguarding the confidential information of its clients. CPAS holds all personal information provided by clients in the strictest confidence and it is the objective of the firm to protect the privacy of all clients. Except as permitted or required by law, the firm does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, the firm will provide clients with written notice and clients will be provided an opportunity to direct CPAS as to whether such disclosure is permissible.

Why We Collect and How We Use Information. To conduct regular business, CPAS may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to the firm
- Information about the client's transactions implemented by the firm or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for CPAS to provide access to customer information within the firm and to nonaffiliated companies, with whom the firm has entered into agreements with. To provide the utmost service, the firm may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on the firm's behalf.

- Information CPAS receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with the firm or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with CPAS

Sharing Information with Other Companies Permitted Under Law. Since CPAS shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's customers or former customers to anyone, except as permitted by law. However, the firm may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that the firm has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, the firm will allow its clients the opportunity to opt out of such disclosure.

Former Customers. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.