

Firm Brochure

(Part 2A of Form ADV)

Compass Portfolio Advisory Services Inc..

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<https://compassfinancialservicesgroup.com>

This brochure provides information about the qualifications and business practices of Compass Portfolio Advisory Services Inc.(CPASI). If you have any questions about the contents of this brochure, please contact us at: 781-535-6083, or by email at: Principals@CompassCapital.co. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Compass Portfolio Advisory Services Inc. is an SEC Registered Investment Advisor. Please note that registration does not imply a certain level of skill or training.

Additional information about Compass Portfolio Advisory Services Inc. is available on the SEC's website at www.adviserinfo.sec.gov

May 23, 2018

Material Changes

Annual Update

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

Material Changes since the Last Update

Full Brochure Available

If you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 781-535-6083 or by email at: Principals@CompassCapital.co or download it from our web site, <https://compassfinancialservicesgroup.com> in the “Disclosures” section.

Notice Required By Section 203(A) Of the Massachusetts Investment Advisors Act

The disciplinary history of this investment advisor and its investment advisor representatives may be obtained upon request from:

Massachusetts Securities Division
One Ashburton Place, 17th Floor
Boston, MA, 02108

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Advisory Business

Firm Description

Compass Portfolio Advisory Services Inc. was founded in 2018 and provides investment management services. Advice is provided through consultation with the client.

Compass Portfolio Advisory Services Inc. is strictly a fee-only investment management firm. The firm does not receive commissions for purchasing or selling annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products.

The firm is affiliated with Compass Holding Group, Incorporated (CHGI), a financial services holding company, Compass Capital Corporation a SEC registered investment advisor firm, and Compass Securities Corporation, an institutional-only FINRA Broker/Dealer that sells financial products or securities to qualified institutions.

Investment advice is provided, with the client making the final decision on investment selection. Compass Portfolio Advisory Services Inc. does not act as a custodian of client assets. The client always maintains asset control. Compass Portfolio Advisory Services Inc. places trades for clients under a limited power of attorney.

Periodic reviews are communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews by professional staff occur but are not necessarily communicated to the client unless immediate material changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

Principal Owners

Compass Holding Group, Incorporated is the 100% owner of Compass Portfolio Advisory Services Inc.. The table below details the beneficial ownership percentage in CCC owned by shareholders of CHGI.

CHGI Shareholder Name	Beneficial Ownership Percentage in CCC
Scott S. Chaisson	78.56%
Timothy F. Shanahan	3.23%
John R. Ahern	3.23%
Thomas Licciardello	3.23%
Walter K. Joly	3.23%
Omar J. Mian	3.23%
Sandra Powers	3.23%
Bruce Winans	2.03%

Types of Advisory Services

Compass Portfolio Advisory Services Inc. provides investment supervisory services, also known as asset management services; furnishes investment advice through consultation, and portfolio management.

As of March 30, 2018, Compass Portfolio Advisory Services Inc. which is a newly registered advisor, manages approximately \$0 in assets for approximately 0 clients. Approximately \$0 is managed on a discretionary basis, and \$0 is managed on a non-discretionary basis. Our investment discretion is limited to implementing the quarterly re-balancing and fund re-allocations to maintain the accounts in line with the investment policy agreed to by our clients.

Tailored Relationships

The goals and objectives for each client are documented in our client records. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Advisory Service Investment Management Agreement

Most clients choose to have Compass Portfolio Advisory Services Inc. manage their assets in order to obtain ongoing in-depth advice. All aspects of the client's financial affairs are reviewed by an advisor. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and

objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. The annual Advisory Service Agreement fee is based on a percentage of the investable assets determined by the advisor on a case by case basis.

Envestnet Program

Clients may be utilizing Compass Portfolio Advisory Services Inc. asset management services through the Envestnet platform. The advisor determines the client fee on a case by case basis and the maximum annual fee that may be charged is 2%. The Envestnet Program fee includes Compass advisory fees, sub-advisors if any and platform fees but does not include any trading costs or custody fees if any charged by a custodian. The Envestnet Program fee is charged quarterly in advance based on the value of your account on the last day of the previous quarter. Fees are automatically deducted from your managed account. In rare cases some clients may be direct billed.

Example:

Compass Portfolio Advisory Services Inc. Investment Management Fee Calculation

Account size at last quarter end			\$1,000,000
Days invested (90 or less)			90
Annual fee – determined by advisor	times	.9250%	\$9,250.00
	times	90/365 = .25	
Quarterly fee charged in advance			\$2,312.50

Note that in certain cases, subject to negotiation between the Compass investment advisor agent and the Client, the actual fee charged may be greater than or less than the blended fee that would otherwise be calculated.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at date of termination is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Asset Management

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management

fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Compass Portfolio Advisory Services Inc. does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, exchange traded funds (ETFs), exchange traded notes (ETNs) and mutual funds shares), U. S. government securities, interests in partnerships, and master limited partnerships.

Initial public offerings (IPOs) are generally not available through Compass Portfolio Advisory Services Inc..

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying Compass Portfolio Advisory Services Inc. in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Compass Portfolio Advisory Services Inc. will refund any unearned portion of the advance payment.

Compass Portfolio Advisory Services Inc. may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Compass Portfolio Advisory Services Inc. will refund any unearned portion of the advance payment.

Fees and Compensation

Description

Compass Portfolio Advisory Services Inc. bases its fees on a percentage of assets under management and/or hourly charges.

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Fees are sometimes negotiable.

Fee Billing

Investment management fees are billed quarterly, in advance, meaning that we invoice you prior to the three-month billing period based on the value of the

quarter that has just ended. Payment in full is expected upon invoice presentation. Fees are usually deducted by the custodian from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. There may also be charges for small accounts and/or account closing fees. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Compass Portfolio Advisory Services Inc., in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Advisory Service Agreement fees are calculated on a formula basis and adjusted for complexity of individual situations.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee, along with other operating costs of running the fund, are called an internal expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% (one half of one percent) for their services. These fees are in addition to the fees paid by you to Compass Portfolio Advisory Services Inc.

Performance figures quoted by mutual fund companies in various publications are after their operating expenses and fees have been deducted.

Past-Due Accounts and Termination of Agreement

Compass Portfolio Advisory Services Inc. reserves the right to stop work on any account that is more than 30 days overdue. In addition, Compass Portfolio Advisory Services Inc. reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Compass Portfolio Advisory Services Inc.'s judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

Performance-Based Fees

Sharing of Capital Gains

Compass fees are not based on a share of the capital gains or capital appreciation of managed securities.

Compass Portfolio Advisory Services Inc. does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

Compass Portfolio Advisory Services Inc. generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, and corporations or business entities. Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$150,000 of assets under management, which equates to an annual fee of \$1,875.

Compass Portfolio Advisory Services Inc. has the discretion to waive the account minimum. Accounts of less than \$150,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$150,000 within a reasonable time. Other exceptions may apply to employees of Compass Portfolio Advisory Services Inc. and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Regarding mutual fund management of portfolios, Compass Portfolio Advisory Services Inc. utilizes the services of Clint Sorrensen CFA of Wealthshield LLC as Outsourced Chief Investment Officer. Additional information about WealthShield LLC is also available on the SEC's website at www.adviserinfo.sec.gov. WealthShield LLC's CRD number is: 288875. Wealthshield (WS) has multiple screening processes which results in a portfolio optimization along the efficient frontier in correlation with the individual clients risk/reward criteria as determined by consultation and data gathering/risk tolerance questionnaire with the client. Wealthshield's methods of analysis include Charting analysis, Fundamental analysis, Quantitative analysis and

Technical analysis. Charting analysis involves the use of patterns in performance charts. WS uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security. Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on. Technical analysis involves the analysis of past market data; primarily price and volume.

In some cases, Compass Portfolio Advisory Services Inc. refers specific styles of investment management out to other investment advisory firms who may perform the analysis and strategies along the lines of dynamic asset allocation with sector rotation of funds. These sub-advisors use their own Form ADV for disclosing their methods of analysis, sources of information and investment strategies.

Investment Strategies

Compass Portfolio Advisory Services Inc. provides investment advisory services and furnishes general financial planning advice, not specifically involving securities, to its clients on the basis of individual needs and objectives through an integrated written personal financial plans. Clients are advised as to the conceptual asset allocation and arrangement of investment assets. Usually, generic investment recommendations or asset class allocations are made with specific funds subsequently identified and recommended based on interactive consultation with the client.

Compass offers mutual fund investment management strategies based on asset allocation and efficient frontier portfolio optimization.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. Clients are asked to complete a questionnaire which details their objectives and risk tolerance. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy. WS uses long term trading and short term trading strategies.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on

existing bonds become less attractive, causing their market values to decline.

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

John R. Ahern, Scott Chaisson, and Tim Shanahan are each investment advisor agents with Compass Capital Corporation and are Registered

Principals with Compass Securities Corporation, a wholly-owned subsidiary of Compass Holding Group Inc., the parent company of CPASI. Compass Securities Corporation is an institutional-only FINRA Registered Broker/Dealer. All of the Principals work on salary only. They receive no commission compensation from Compass Securities Corporation, although they may receive 12b1 trails.

Compass may from time to time enter into arrangements with other investment advisors. In the arrangements where Compass is the sub-advisor, it is expected that Compass' Form ADV Part II will be offered to the clients of the other firms as additional disclosure. In those situations where Compass engages another firm to sub-advise, the Form ADV Part II of that firm will be offered to clients as additional disclosure. In the sub-advisory arrangements there is both a sharing of the investment responsibility and the investment management fee.

Affiliations

CHGI wholly owns Compass Portfolio Advisory Services Inc., Compass Capital Corporation., Compass Securities Corporation, and Compass Securities Insurance Agency, Inc.

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

Code of Ethics

Compass Portfolio Advisory Services Inc., an SEC-registered investment adviser under Rule 204A-1, has adopted a **Code of Ethics** as of May 1, 2018 that does the following:

1. Sets forth a standard of business conduct required of all employees that, at a minimum, reflects the adviser's fiduciary obligations and requires compliance with the federal securities laws
2. Requires our "access persons" to report their personal securities transactions and holdings on an initial and ongoing basis
3. Requires our "access persons" to obtain the firm's approval before investing in an initial public offering or private placement
4. Requires Compass to maintain and enforce the code of ethics, including reviewing the personal trading reports to identify improper trades or patterns of trading and promptly reporting of any violations
5. Requires us to provide a copy of the code of ethics to all employees and obtain each employee's written acknowledgement of receipt.

Compass will upon request furnish its clients with a copy of our Code. It is available at any time for download from our web site under "Disclosures" at <https://compassfinancialservicesgroup.com>.

Participation or Interest in Client Transactions

Officers and employees of Compass Portfolio Advisory Services Inc. may, from time to time, buy or sell some of the same securities (usually mutual funds) that it recommends to its clients. These transactions are executed in full compliance with FINRA regulations on insider trading, Chinese walls, free riding, front running and withholding. As a matter of firm policy trades of affiliated persons are not knowingly executed before customer's orders.

Personal Trading

The Chief Compliance Officer of Compass Portfolio Advisory Services Inc. is Tim Shanahan. He reviews all employee trades each quarter. His trades are reviewed by John Ahern. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

CHGI, the parent company of Compass Portfolio Advisory Services Inc., also owns Compass Securities Corporation, which is an institutional-only FINRA Broker/Dealer. Compass Securities Corporation does not process retail business.

Best Execution

Compass Portfolio Advisory Services Inc. reviews the execution of trades at each custodian each quarter. The review is documented in the Compass Portfolio Advisory Services Inc. *Compliance Manual*. Trading fees charged by the custodians are also reviewed on a quarterly basis. Compass Portfolio Advisory Services Inc. does not receive any portion of the trading fees.

Soft Dollars

Compass Portfolio Advisory Services Inc. has no soft dollar arrangements for equipment or non-research services with anyone. Compass Securities Corporation, the FINRA Broker/Dealer affiliate, may receive 12-B-1 servicing fees on certain mutual funds used in investment advisory funds for investment advisory client portfolios.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

CPASI reviews its client accounts at least annually. The review may range from daily supervision of trades, monthly statement reviews and account information to complete update of the financial plan, as needed. In the case of managed accounts, typically the client is receiving a consolidated statement either on a monthly basis, or at least on a quarterly basis. Managed account client portfolios are reviewed quarterly with rebalancing within certain tolerances, to the model as recommended by Compass. In addition, reviews are triggered by changes in tax laws, the client's individual situation, economic conditions, and at the client's request. The reviewers are Certified Financial Planners or investment advisor agents. Investment advisory accounts have no limits.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, substantial market moves, and changes in a client's own situation.

Regular Reports

Monthly reports, which are statements of position and asset allocation are supplemented by either annual or quarterly performance measurements. At the clients' request, an interim report may be produced. Generally, telephone and/or e-mail communication occurs between each client and advisor as needed. Most clients meet with an advisor on either a quarterly or an annual basis. Typically, in the case of a full service financial plan, a revised net worth statement and income tax projection are presented to the client on at least an annual basis. At the firm's discretion, a quarterly advisory newsletter may be sent out to each client as well.

In the case of investment advisory assets under management, it is typical that a consolidated statement be issued monthly or quarterly with an advisory letter, performance measurement, and economic review.

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Client Referrals and Other Compensation

Incoming Referrals

Compass Portfolio Advisory Services Inc. may use fully disclosed solicitors, who under written agreement, generate referrals to the firm. These individuals

may at their option, receive a finder's fee up to a maximum of 25% of the investment advisory fee. As of this amendment, no agreements are in effect and it is not our practice to pay a finder's fee.

In addition, Compass Portfolio Advisory Services Inc.. expects to be fortunate to receive many client referrals over time. The referrals would come from current clients, estate planning attorneys, accountants, and similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Compass Portfolio Advisory Services Inc. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

Compass may from time to time enter into arrangements with other investment advisors. In the arrangements where Compass is the sub-advisor, it is expected that Compass' Form ADV Part II will be offered to the clients of the other firms as additional disclosure. In those situations where Compass engages another firm to sub-advise, the Form ADV Part II of that firm will be offered to clients as additional disclosure. In the sub-advisory arrangements there is both a sharing of the investment responsibility and the investment management fee.

A Compass affiliate, Compass Securities Corporation, may receive compensation for representing managers or distributing funds used by Compass Portfolio Advisory Services Inc..

Custody

SEC "Custody"

At no time does Compass Portfolio Advisory Services Inc. have custody of client cash or securities.

Account Statements

All assets are held at qualified custodians which means the custodians provide account statements directly to clients either online or at their address of record at least quarterly.

Investment Discretion

Discretionary Authority for Trading

Compass Portfolio Advisory Services Inc. accepts limited discretionary authority to manage securities accounts on behalf of clients including

reallocation and rebalancing of portfolios. Compass Portfolio Advisory Services Inc. has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold within the boundaries of the investment policy adopted by the client. However, Compass Portfolio Advisory Services Inc. consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. Compass Portfolio Advisory Services Inc. does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Limited discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement and maintain the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

Compass Portfolio Advisory Services Inc. does not vote proxies on securities. Clients are expected to vote their own proxies. When assistance on voting proxies is requested, Compass Portfolio Advisory Services Inc. will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

Compass Portfolio Advisory Services Inc. does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Compass Portfolio Advisory Services Inc. does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client, and six months or more in advance.

Business Continuity Plan

General

Compass Portfolio Advisory Services Inc. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people. See our website for our Business Continuity Plan disclosure statement.

Disasters

The Business Continuity and Disaster Recovery Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Information Security Program

Information Security

Compass Portfolio Advisory Services Inc. maintains an information security program including an Identity Theft Prevention Program (ITPP) to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

Compass Portfolio Advisory Services Inc. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of

information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

Professionals engaged in financial planning and investment advisory activities with Compass Capital are all college educated. All have significant, relevant experience in the financial services industry or the investment field. In addition, many have attained the Certified Financial Planner (CFP) designation through the College of Financial Planning. Most CFP®s maintain their license in good standing with the Certified Financial Planners Board of Standards and Practices, which requires the CFP® to abide by IBCFP's code of ethics and standards of practice and to continue to comply with all post certification requirements such as continuing education.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners™ are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Chartered Financial Analyst (CFA): The Chartered Financial Analyst charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Timothy F. Shanahan, CERTIFICATIONS

Date of birth: 1953

Educational Background:

- B.A., Psychology. Suffolk University, Boston, MA, 1975
- College for Financial Planning, Denver, CO, 1984

Business Experience:

- Compass Portfolio Advisory Services Inc., Founder, President and Beneficial Shareholder. 1984 to Present. FINRA series 65.
- Compass Securities Corporation, Founder and Chairman, 1985 to Present. Registered Principal 7/5/85 to 12/31/13 and 1/1/15 to Present.
- Capital Guardian LLC, Registered Representative, January 2014 to 12/31/14. FINRA Series 7, 24, 27, 63, 79. CRD number 709231.
- Cavalier Funds, CFO, portfolio co-manager. 2016
- FINRA Dispute Resolution Inc., Arbitrator, Industry Panelist, Chairperson qualified. 1994 to Present.
- American Arbitration Association, Arbitrator, 1993 to 1996.
- Markets Flow, RIA Agent 2018
- Compass Portfolio Advisors, Inc. CFO, Director, 2018

Disciplinary Information: None

Other Business Activities: Tomaltach O'Seanachain Realty Trust

Additional Compensation: None

Supervision:

Timothy Shanahan is supervised by John Ahern. Tim and John work in the same office.

John Ahern's contact information: 781-535-6083,
John@compasssecurities.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

John R. Ahern, CERTIFICATIONS

Date of birth: 1941

Educational Background:

- B.S., Engineering, United States Military Academy, West Point, NY, 1963
- M. Eng., Manufacturing Engineering, Boston University, Boston, MA, 1971
- M.B.A., Boston University, Boston, MA, 1975

Business Experience:

- Compass Portfolio Advisory Services Inc., Senior Vice President, Beneficial Shareholder. 1994 to Present
- Compass Securities Corporation, Registered Principal, 1989 to Present. President, 2009 to 2014. FINRA Series 7, 63, 24, 79
- Loper Associates, President, 1972 to Present

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

John Ahern is supervised by Tim Shanahan, President. John and Tim work in the same office.

Tim Shanahan's contact information: 781-535-6083,
Tim@compasscapital.co

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Scott S. Chaisson, CERTIFICATIONS

Date of birth: 1963

Educational Background:

- MBA – Entrepreneurship, DePaul University 1993
- BS – Engineering, U.S. Military Academy 1986

Business Experience: (list past 10 years)

- CEO, Compass Holding Group Inc., 2015 to present
- Cavalier Funds, CEO, portfolio co-manager. 2016
- Compass Securities Corporation, Registered Principal, 2015 to present
- President, Capital Guardian Wealth Management 2012-2015
- Managing Director, Rehmann Financial 2010-2012
- Managing Director, Oppenheimer 2009-2010

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Scott Chaisson is supervised by Tim Shanahan, President.
Tim Shanahan's contact information: 781-535-6083,
Tim@compasscapital.co

Arbitration Claims: 1 pending (stayed)

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

