

CMPD Wealth

Part 2A of Form ADV

The Brochure

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This brochure provides information about the qualifications and business practices of CMPD Wealth (“CMPD”). If you have any questions about the contents of this brochure, please contact us at 737-444-9614. 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. CMPD is

Additional information about CMPD is also available on the SEC’s website at: www.adviserinfo.sec.gov.

CMPD is a registered adviser with the United States Securities and Exchange Commission and conducts itself accordingly. Such registration requires that we conduct our business in accordance with the Investment Advisers Act of 1940 (the “Advisers Act”) but does not require specific professional financial training or exams or imply a certain level of skill or training.

Item 2. Material Changes

Form ADV Part 2A requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Generally, CMPD will notify clients of material changes on an annual basis. However, where CMPD determines that an interim notification is either meaningful or required, CMPD will notify its clients promptly.

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Item 4. Advisory Business

CMPD is an internet investment adviser registered with the SEC that provides non-discretionary advisory services through a digital platform (“Platform”) to its advisory clients (each a “Client” and collectively, “Clients”) through a website portal (the “Website”) and a mobile application (the “App”) (collectively, the “Services”). CMPD was founded in 2021 and is principally owned and controlled by Dark Knight OZ Fund, LLC.

CMPD provides a Platform that is designed for underinvested individuals and communities. CMPD offers personal finance advice, education, services, and products that allow users to make investments, gain financial literacy, and in certain circumstances described below, earn rewards or other incentives for using third-party arrangements.

All client accounts are non-discretionary, which means that CMPD does **not** manage security selection for client accounts. CMPD will **not** have the authority to modify, in its sole discretion and without prior notice to Clients, the selection of investment products that comprise each of the portfolios and the relative weighting of investment options and allocation to cash within the model portfolios.

Clients must be mindful that the Services include non-discretionary investment advice. Any such advice will not be tailored to a Client’s individual circumstances and does not represent a comprehensive investment program. Although CMPD may provide tools that enable Clients to assess tolerance for risk, or otherwise assist to educate Clients about financial transactions, CMPD does not determine if the tools and resources made available through the Services will result in suitable investments designed to meet the Client’s particular investment or financial needs. Clients should understand and acknowledge that Clients are solely responsible for all investment decisions that Clients make regarding the transactions made in their account. Any investment decisions Clients make based on information obtained from the Services will be based solely on a Client’s own evaluation of his or her financial circumstances and investment objectives and the risk associated with the investment. All investments contain risk, including the risk of complete loss of the investment.

To begin using the Platform, a Client must complete the digital account opening process, enter into a non-discretionary investment advisory agreement with CMPD (“Advisory Agreement”) and other related agreements governing the Client’s account in the platform (“Client Account”). A Client must initially invest and maintain at least \$1000 in the Client Account to be eligible to maintain an account on the Platform. CMPD may, in its sole discretion, waive or change the minimum investment amount at any time for any Client. Initial and subsequent deposits may generally not be invested for up to sixty days. Participation in the Platform also requires Clients to consent to electronic delivery of communications. You may inquire about the services offered through the Platform and obtain information about the management of your Client Account at any time by contacting CMPD through one of its representatives over email or online chat.

The non-discretionary investment advisory services offered through the Platform are driven first by the Client’s self-identified investment goals, which a Client chooses when setting up the Client Account. The investment goals currently available to be selected on the Platform are “Pay Off

Debt,” “Save on Monthly Bills,” “Invest,” “Build My Savings,” “Repair My Credit,” and “Manage a Business.” CMPD intends to add additional goal options in the future.

The platform offers Clients access to model investment portfolios (“Model Portfolios”) developed by CMPD. The specific Model Portfolio that CMPD recommends to a Client is based on information that the Client provides through the Services (“Client Inputs”), including, but not limited to: the Client’s current age, employment, income, investing experience, investment horizon, and risk tolerance. The Model Portfolio represents a mixture of asset classes designed to help the Client achieve their investment goal(s).

Clients should understand that the platform relies upon Client Inputs and CMPD does not capture any additional information not covered in the questions the Company asks in its questionnaires in making its recommendations and providing its investment advice. Clients are obligated to update their information through the Services promptly if there are changes to Client Inputs previously provided.

Based on Client Inputs, the platform analyzes the information and provides the Client with an initial recommended Model Portfolio comprised of exchange-traded funds (“ETFs”) and select individual equities with a market capitalization greater than \$3 billion (collectively, “Portfolio Securities”). After making a recommendation for an initial portfolio, CMPD will not actively monitor a Client’s Account or make any other recommendations regarding the composition of a particular Client’s portfolio. CMPD reviews the performance and risk profile of the underlying investments of each Model Portfolio on an ongoing basis and uses its discretion to add or modify investments within the portfolio as appropriate.

Clients may, in their sole discretion, decide to select a portfolio that is different from the Model Portfolio recommended by CMPD when opening an account or at any other time. Clients may also elect to ignore CMPD’s recommendations and to manage their own portfolio and select securities from a curated list of Portfolio Securities at their sole discretion. CMPD reserves the right to remove any Portfolio Security from the curated list at any time, without prior notification to its Clients.

The Platform is not intended to provide legal or tax advice or intended to serve as tax preparation services. The Platform is not intended to provide a personalized or comprehensive investment plan. The Platform is intended only to assist Clients with financial organization and decision-making, and is intended to be broad in scope. Each Client’s personal financial situation is unique, and any information obtained through the Services may not be appropriate for each Client’s personal circumstances. Accordingly, before making any final investment decisions or implementing any financial strategy, Clients should consider obtaining additional information and advice from a tax, accounting and other certified financial advisers who are fully aware of a Client’s individual circumstances.

The Services may present Clients with information relating to third-party products or services (“CMPD Offers”) that Clients may be interested in as well as provide Clients general tips, recommendations and educational material. Please refer to Item 10 below for further information.

As of the date of this initial filing, CMPD does not manage any client assets on a discretionary or non-discretionary basis.

Item 5. Fees and Compensation

CMPD does not charge management fees in connection with its advisory services.

When an ETF is used for a Model Portfolio and is in turn used for Client Accounts, Clients should be aware that ETFs charge their own fees and expenses. These fees and expenses will affect Clients' returns. For instance, an ETF typically includes embedded expenses that may reduce the fund's net asset value and, therefore, directly affect the fund's performance and indirectly affect the Account's performance. Expenses of an ETF may include management fees, custodian fees, brokerage commissions, and legal and accounting fees. These expenses may change from time to time at the sole discretion of the ETF issuer.

Clients will bear trading costs, custodial fees, and other expenses that may be charged by third parties, such as DriveWealth, in connection with the advisory services provided through the Platform. Clients should review all fees charged by third parties, such as DriveWealth, who provides custodial and brokerage services for Client Accounts, to fully understand the fees to be paid. For additional information about brokerage, please see Item 12 "Brokerage Practices." CMPD may, in its sole discretion, decide to reimburse Clients for trading costs, custodial fees, and other expenses such that Clients bear no such costs. Clients should understand that CMPD does not guarantee that it will cover such costs and CMPD may discontinue any reimbursement program at any point. Clients should expect that they will bear the full amount of trading costs, custodial fees, and other expenses that may be charged by third parties, such as DriveWealth.

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

CMPD does not charge any performance fees. Some investment advisers experience conflicts of interest in connection with the side-by-side management of accounts with different fee structures. However, these conflicts of interest are not applicable to CMPD.

Item 7. Types of Clients

The Platform is available to individuals who are legal U.S. residents. The Platform is designed to provide investment advisory services to individuals who have regular internet access, and who are comfortable investing in equities and ETFs with a market capitalization of greater than \$3 billion through a digital investment experience. Participation in the Platform requires that a Client complete an account application and be approved for an account with DriveWealth. The account application can be accessed online through CMPD's Services account portal or at www.cmpdwealthblog.com. As discussed in Item 4 above, Clients are required to enroll in electronic delivery in order to participate in this Platform.

As mentioned in Item 4, a Client must initially invest and maintain at least \$1000 in the Client Account to be eligible to maintain an account on the Platform.

To receive investment advisory services through the Platform, prospective Clients will be required to complete an online account application and enter into the Advisory Agreement and other account agreements electronically through the Services. These agreements along with other disclosures and notices will be delivered to Clients in electronic format by posting the information on the Services where Clients can access their accounts and through email or other electronic means. CMPD will not send paper versions of documents to Clients as part of the Platform unless required by applicable law or in CMPD's sole discretion. Clients must be willing to provide electronic consent, which will require that the Clients agree to electronic delivery of all current and future Platform documents and communications, to enroll in the Platform.

Clients must provide CMPD with a valid email address to enroll in the Platform. Clients are required to notify CMPD immediately through the Services in the event their email address changes, or becomes inaccessible. Clients will be alerted through the Services and by email when a new or amended agreement or document is available; therefore, it is important that Clients always maintain an accurate email address. If a Client fails to provide or maintain accurate contact information, including an email address, or otherwise revokes consent to electronic delivery, CMPD reserves the right to terminate that Client's participation in the Platform.

Please refer to the Terms of Use for additional information regarding the need to provide consent to receive communications electronically in order for CMPD to provide its services through the Platform.

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

Through qualitative and quantitative due diligence, CMPD selects investments that are utilized for each Model Portfolio. CMPD employs a variety of methods and strategies to make investment decisions and recommendations, but CMPD plans to primarily employ a Growth at a Reasonable Price strategy, which will incorporate elements of growth investing (i.e. a focus on sustained high revenue and free cash flow growth) and value investing (i.e. focus on valuation and out of favor companies with a time horizon of greater than five years).

CMPD primarily offers investment advice on ETFs and individual equities, which are allocated in different amounts depending on the Model Portfolio. The ETFs and individual securities used for Client Account portfolios are expected to have a market capitalization of greater than \$3 billion.

CMPD's main sources of information for formulating the basis for changes to each security used for Client Accounts will include data about ETFs provided by third party data vendors, public financial information provided by each individual security issuer, and publicly available research provided by third parties.

CMPD does not make any assurance that its recommendations will result in profitable investing or avoidance of loss. Investing in securities involves risk of loss that Clients should understand and be prepared to bear. CMPD makes no guarantee or representation that its investment recommendations will be successful. Investment performance can never be predicted or guaranteed and the value of each Client's account will fluctuate due to market conditions and other factors. Past performance is no guarantee of future results.

Material Risks

In general, all Client Accounts are subject to risks, including the risks discussed below. This brochure does not include every potential risk associated with the Platform or all of the risks applicable to a particular Client Account. Rather, it is a general description of certain risks inherent in the Platform. Clients should refer to their Advisory Agreement and the underlying prospectuses for the ETFs offered through the Platform for additional information.

Investing in securities like equities and ETFs, whether through the Platform or otherwise, involves risk of loss that Clients should be prepared to bear. CMPD does not guarantee the results of any advice or recommendation. In addition, CMPD does not guarantee that the objectives of the Client will be met. The advice provided to the Client only pertains to the Client Account managed by CMPD. Clients should be aware that Clients may lose money by investing in equities and ETFs through the Platform.

CMPD in general advocates a buy and hold strategy of high quality businesses. It is our belief that frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes and as such we encourage Clients to identify good companies that are likely to grow and to hold on to those investments. This strategy may lead to periods of relative underperformance as sectors and individual companies go in and out of favor.

Market, interest rate, investment and other related risks may adversely affect the performance of securities held in Client Accounts and cause losses in a Client Account. The following is a list of some of the principal risks of investing with CMPD and of investing through a digital investment platform. The following list of risks is not intended to be a comprehensive list of risks.

Investing in ETFs. A Client Account bears all the risks of the investment strategies employed by the ETFs held in the Client Account, including the risk that an ETF will not meet its investment objectives. The ETFs held in Client Accounts may invest in equities, fixed income, derivatives, and other asset classes; the risks associated with such investments are described below. For the specific risks associated with any particular ETF, please refer to its prospectus.

An ETF is subject to the risks of the underlying securities that it holds, as well as the risk that it may fail to closely track the index it follows (tracking error). ETFs are subject to fees and expenses (like management fees and operating expenses) that do not apply to an index, and a Client Account will indirectly bear its proportionate share of the fees and expenses of the ETFs in which it invests. Moreover, ETF shares may trade at a premium or discount to their net asset value ("NAV"). Therefore, due to variations in the NAV of the ETF under certain circumstances the ETF could trade for more or less than the value of the underlying investments if bought separately. Although ETFs are required to calculate their NAV on a daily basis, at times the market price of an ETF's shares may be more than the NAV (trading at a premium) or less than the NAV (trading at a discount). Given the differing nature of the relevant secondary markets for ETFs, certain ETFs may trade at a larger premium or discount to NAV than shares of other ETFs depending on the markets where such ETFs are traded. The risk of deviation from NAV for ETFs generally is heightened in times of market volatility or periods of steep market declines. For example, during periods of market

volatility, securities underlying ETFs may be unavailable in the secondary market, market participants may be unable to calculate accurately the NAV per share of such ETFs, and the liquidity of such ETFs may be adversely affected. This kind of market volatility may also disrupt the ability of market participants to create and redeem shares in ETFs. Further, market volatility may adversely affect, sometimes materially, the prices at which market participants are willing to buy and sell shares of ETFs. As a result, under these circumstances, the market value of shares of an ETF may vary substantially from the NAV per share of such ETF, and the Client may incur significant losses from the sale of ETF shares.

As an ETF trades on an exchange, it is subject to the risks of any exchange-traded instrument, including: (i) an active trading market for its shares may not develop or be maintained, (ii) market makers or authorized participants may decide to reduce their role or step away from these activities in times of market stress, (iii) the exchange may halt trading of its shares, and (iv) its shares may be delisted from the exchange. This means there may be times when ETFs are not as liquid as other investments.

In addition, ETF managers that offer passive investment strategies generally do not seek to outperform their benchmark. As a result, ETF managers may hold securities that are components of their underlying index, regardless of the current or projected performance of the specific security or market sector. Passive managers do not attempt to take defensive positions based upon market conditions, including declining markets. This approach could cause a passive vehicle's performance to be lower than if it employed an active strategy.

Fractional Share Trading. CMPD may elect to trade fractional shares of ETFs within a Client Account. The ETF shares purchased or sold on behalf of Clients may be either whole shares or fractional shares, depending upon the asset allocation for that Client Account. CMPD invests Client Accounts in dollar-based quantities, whereby transactions are based on a fixed dollar amount rather than whole shares. CMPD and DriveWealth each reserve the right, at any time and each in its sole discretion, without prior notice to Clients, to limit or stop trading fractional shares. Fractional shares are typically unrecognized and illiquid outside of a Client Account. Therefore, Clients cannot transfer fractional shares when closing their Client Account. Fractional shares will be converted to cash upon account closing.

Equity Investments. Price changes may occur in the market, or in a country, industry, or sector of the market. In addition, different types of stocks tend to shift in and out of favor depending on market and economic conditions, and the types of stocks in which a Client Account invests may underperform the market. For example, growth stocks can be more volatile than other types of stocks, and the market can undervalue value stocks for long periods of time. Dividends on common stocks are not fixed but are declared at the discretion of an issuer's board of directors. There is no guarantee that a company will pay dividends, or that if paid they will remain at current levels or increase over time.

Market Risk. The price of any security or the value of an entire asset class can decline for many reasons, including but not limited to interest rates, regulatory changes, unpredictable market sentiment changes, and political, economic and social conditions.

Foreign Investments. Foreign securities are subject to interest rate, currency exchange rate, economic, regulatory, and political risks, all of which may be greater in emerging markets. These risks are particularly significant for funds that focus on a single country, region, or emerging markets. Foreign markets may be more volatile than U.S. markets and can perform differently from the U.S. market. Emerging markets can be subject to greater social, economic, regulatory, and political uncertainties and can be extremely volatile. Foreign exchange rates can also be extremely volatile.

Derivatives. Certain ETFs may invest in derivatives. A derivative is a financial contract whose value is based on the value of a financial asset (such as a stock, bond, or currency); a physical asset (such as gold, oil, or wheat); or a market index (such as the S&P 500® Index). Investments in derivatives may subject these funds to risks different from, and possibly greater than, those of the underlying securities, assets, or market indexes. Some forms of derivatives, such as exchange-traded futures and options on securities, commodities, or indexes, have been trading on regulated exchanges for decades. These types of derivatives are standardized contracts that can easily be bought and/or sold, the market values of which are determined and published daily. Non-standardized derivatives (such as swap agreements), on the other hand, tend to be more specialized or complex, and may be more difficult to value. Derivatives may involve leverage because they can provide investment exposure in an amount exceeding the initial investment. As a result, the use of derivatives may cause funds to be more volatile because leverage tends to exaggerate the effect of any increase or decrease in the value of a fund's portfolio securities.

Legislative and Regulatory Risk. Client Accounts may be adversely affected by new (or revised) laws or regulations. Changes to laws or regulations can impact the securities markets, specific industries, individual issuers of securities, and CMPD's determinations with respect to the expected rate of return, value, or creditworthiness of a security.

Algorithm Risk. There are inherent limitations to using algorithms to recommend a Model Portfolio and manage a Client Account. The algorithms are also not designed to consider certain factors, including individual tax circumstances such as capital gains taxes; rather, their functions consist of proposing a portfolio based on the Client Inputs. The questionnaires Clients complete use a limited universe of inputs to recommend a Model Portfolio from a limited universe of possible outputs. In particular, CMPD provides an initial recommended Model Portfolio based on Client Inputs provided by the Client through the Services and does not verify the completeness or accuracy of such information or consider any information outside of the Client Inputs. The Platform uses Client Inputs to recommend a Model Portfolio for a Client Account from a limited number of Model Portfolios. The Platform is designed so each combination of responses maps to one of the Model Portfolios.

Additionally, there is also a risk that the algorithms and related software used for the Platform may not perform within intended parameters, which may result in a recommendation of a portfolio that may be more aggressive or more conservative than necessary. In addition, changes to an algorithm's code, although subject to compliance controls and testing, may not have the desired effect with respect to Client Accounts.

Asset Allocation Risk. Asset allocation decisions can result in more portfolio concentration in a certain asset class or classes, which could reduce overall return if the concentrated assets

underperform expectations. The more aggressive the investment strategy chosen by a Client, the more likely the Client Account will contain larger weights in riskier asset classes, such as equities. Asset classes can perform differently from each other at any given time (as well as over the long term), so the investment strategy will be affected by its allocation among the asset classes. Depending on market conditions, there may be times when diversified portfolios perform worse than less diversified portfolios. Diversification does not eliminate investment risk.

Cybersecurity. The Platform and the Services pose the risk of actual and attempted cyber-attacks, including denial-of-service attacks, harm to technology infrastructure and data from misappropriation or corruption, and reputational harm. Due to CMPD's interconnectivity with DriveWealth and other third-party vendors, CMPD, and thus indirectly the Client Accounts, could be adversely impacted if any of them is subject to a cyber-attack or other information security event. Although CMPD takes protective measures and endeavors to modify them as circumstances warrant, its computer systems, software, and networks may be vulnerable to unauthorized access, misuse, computer viruses or other malicious code, and other events that could have a security impact, or render CMPD unable to transact business on behalf of Client Accounts.

Technology and Operational Risk. The Platform depends heavily on information technology and other operational systems. Shortcomings or failures in internal processes or systems of CMPD, DriveWealth, and other third parties integrated into the Platform and other external events impacting those systems, and human error pose the risk of underperformance (or the possibility of no returns) of the Platform. Operational risk can arise from many factors ranging from routine processing errors to potentially costly incidents such as major system failures.

Limited Nature of Platform. The Platform offered by CMPD is not intended as a complete investment program for any Client. The advice is provided exclusively on assets in the Platform and does not consider other investments the Client may have. CMPD may ask fewer questions and elicit less information than Clients might be asked through a traditional advisory program. As a result, the use of the Client Inputs to create a recommended portfolio for a Client may result in a different recommendation than if the Client completed a longer questionnaire and/or had an in-person interview with an adviser. CMPD representatives are available electronically to discuss the questions provided on the Services and/or to answer questions about the Platform.

Item 9. Disciplinary Information

CMPD and its management persons have not been involved in any legal or disciplinary events in the past 10 years that would be material to a client's evaluation of the company or its personnel.

Item 10. Other Financial Industry Activities and Affiliations

CMPD and its management persons have no other financial industry activities or affiliations and therefore have no related conflict of interest that are material to a Client's or prospective client's evaluation of the Company's business.

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

CMPD's code of ethics establishes standards of business conduct for CMPD and its supervised persons. All supervised persons will act with competence, dignity, integrity, and in an ethical manner, when dealing with Clients, the public, prospective clients, third-party service providers and fellow supervised persons. Supervised persons must use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, trading, promoting CMPD's services, and engaging in other professional activities. A copy of CMPD's code of ethics is available upon request.

To avoid conflicts of interest involving personal trades, CMPD's code of ethics states that each "access person" must have written clearance involving initial public offerings, private placements, and certain individual securities before completing the transactions. Access persons will generally be permitted to trade Securities that are in client portfolios. CMPD may disapprove any proposed transaction required to be pre-cleared, particularly if the transaction poses a conflict of interest or otherwise appears improper. Additionally access persons will be required to provide quarterly transaction reports regarding transactions and holdings in "Reportable Securities" as defined in the Advisers Act in accounts in which they have beneficial interest. Access persons must disclose all securities accounts in which they have beneficial interest initially upon becoming an access person and annually thereafter. CMPD compliance provides training to its access persons regarding permissible personal trading activities and reviews personal trading transaction and holdings reports provided by its access persons.

Item 12. Brokerage Practices

Clearing and custody services are provided by DriveWealth, an unaffiliated broker-dealer offering clearing, custody, trade execution, and related services. Clients must enter into a service agreement with DriveWealth to participate in the Platform. Under the terms of the Platform and its related agreements, Clients authorize CMPD to execute orders for all Client portfolio transactions through DriveWealth. Clients will bear the risk of such transactions. Clients should understand that CMPD will trade through DriveWealth even if the use of a different broker-dealer may result in lower prices or more favorable execution.

CMPD does not receive any compensation from DriveWealth, counterparties or other third parties in connection with such transactions. Costs associated with trading with DriveWealth (i.e. trade execution costs) are borne by Clients.

In evaluating the use of a counterparty such as DriveWealth, CMPD considers multiple factors in its determination to enter into such trading relationship. CMPD seeks to ensure that its Client Accounts receive the best overall execution for securities transactions by continuously monitoring and reviewing the services received by counterparties, such as DriveWealth. CMPD oversees DriveWealth's overall trade execution quality, commissions, financial strength and reputation, and digital and technological capabilities, among other factors. CMPD evaluates its counterparty's ability to integrate with the Platform to allow CMPD to seamlessly execute its investment strategies

and manage Client Accounts in a digital environment. Use of DriveWealth provides benefits to CMPD and its Clients such as software and technology that (i) provide access to Client account data (such as trade confirmations and account statements); and (ii) facilitates trade execution and allocate aggregated trade orders for multiple Client Accounts. To the extent that any counterparty's best execution capability does not appear to meet the quality of best execution on a consistent basis, CMPD would look to remove and replace such counterparty with another that has the ability to integrate with CMPD's Platform.

CMPD does not engage in any "soft dollar" practices involving the receipt of research or other brokerage service in connection with Client transactions, nor does CMPD compensate or otherwise reward any brokers for Client referrals.

In the interest of seeking best trade execution for its Clients, CMPD may aggregate transaction orders for a Client Account with transaction orders of other Client Accounts through the execution arrangement with DriveWealth. If a Client's transaction orders are aggregated, the average price of the securities purchased or sold in such a transaction will be determined, and each Client will be charged or credited, as the case may be, the average transaction price. As a result, the price may be either more or less favorable to the Client than it would be if similar transactions were not being executed concurrently for other Client Accounts.

Item 13. Review of Accounts

CMPD generally provides all Clients with continuous access to its Services. Through the Services, Clients can access real-time information about their account status, portfolio allocations, securities, and balances. CMPD will review each Model Portfolio on an ongoing basis. CMPD will not perform reviews of individual Client Accounts. Clients are obligated to update their information through the Services promptly if there are changes to Client Inputs previously provided.

Clients have access to current account balances and positions through the Services. DriveWealth, in its capacity as the custodian, prepares account statements showing all transactions and account balances during the prior quarter. All information relating to Clients and Client Accounts is provided on the Services and/or sent via email as required.

Generally, on a quarterly basis, CMPD will remind Clients to review and update the profile information previously provided. CMPD requests that Clients reconfirm their current profile information as needed and on an annual basis.

After making a recommendation for an initial portfolio, CMPD will not actively monitor a Client's Account or make any other recommendations regarding the composition of a particular Client's portfolio. Clients are obligated to manage their own portfolio after CMPD's initial recommendation, either leveraging the Model Portfolio recommended by CMPD, selecting another Model Portfolio provided on CMPD's platform, or selecting Portfolio Securities from CMPD's curated list. CMPD will not make rebalance recommendations for any individual Client Account.

CMPD's CEO and CCO will review any material changes to any algorithm used by the Company prior to implementation. CMPD will also perform testing to ensure that the Platform is making the correct initial portfolio recommendations based on Client Inputs.

At least quarterly, DriveWealth must give account statements to Clients. Clients are urged to compare these with reports provided by CMPD.

Item 14. Client Referrals and Other Compensation

CMPD expects from time to time to run promotional campaigns to attract Clients to open Client accounts on the platform. This includes the referral program pursuant to which Clients may invite friends, family, and others to open an account with CMPD and receive cash for investment in the Client Accounts of the referring and/or the referred Clients. CMPD expects that it will have certain arrangements in which it compensates bloggers and/or speakers on the Platform for Client referrals.

These arrangements may create an incentive for existing Clients, paid bloggers and/or speakers to refer prospective Clients to CMPD, even if the Client and/or third party would otherwise not make the referral. These arrangements may also create a conflict of interest for a Client to maintain its Client Account with CMPD if doing so would result in eligibility to receive an incentive, bonus or additional compensation. Note however that Clients are not charged any fee nor do they incur any additional costs for being referred to CMPD through any referral program.

CMPD may in its sole discretion discontinue (or not offer) a referral program in its entirety or partially, including without limitation by excluding specific Clients or groups of Clients.

The Services are expected to include sponsored links from advertisers, unaffiliated financial institutions and other third parties. The Services may display CMPD Offers that may be custom matched to Clients based on information stored in the Services, queries made through the Services or other information. We may disclose when a particular CMPD Offer is sponsored or otherwise provided by a third party.

In connection with CMPD Offers, the Services expects to provide links to other websites belonging to CMPD advertisers and other third parties. CMPD Offers are provided to Clients as a convenience. CMPD does not recommend, endorse, warrant or guarantee the products or services available through the CMPD Offers (or any other third-party products or services advertised on or linked from our site), whether or not sponsored. CMPD is not an agent or broker or otherwise responsible for the activities or policies of those websites. CMPD does not guarantee that any loan, investment, plan or other service terms, rates or rewards offered by any particular advertiser or other third party on the Services are actually the terms that may be offered to Clients if Clients pursue the offer or that they are the best terms or lowest rates available in the market. Information in the CMPD Offers is provided by the third parties, and any offer is subject to the third parties' review of a Client's information. CMPD expects to receive compensation from third parties which may impact the placement and availability of the CMPD Offers. If CMPD receives compensation from a third-party directly as a result of a Client's purchase of a product or service in connection with a CMPD Offer, CMPD will provide the Client with at least 10% of such compensation, which may be made

available to you in a variety of means, as determined in our sole discretion (i.e., cash deposit into your account, fractional share of a security, etc.)

Item 15. Custody

CMPD does not act as a custodian for Client assets and does not have physical custody of Client funds or securities at any time. DriveWealth serves as the qualified custodian for all Client Accounts. DriveWealth will provide regular ongoing statements to you showing your securities positions and account activity. You should promptly and carefully review the statements provided by DriveWealth and compare them against the Account information available online through the Services and notify us promptly in writing via email of any errors or discrepancies.

CMPD will be deemed to have custody of Client funds or securities as defined in Rule 206(4)-2 of the Advisers Act (“Custody Rule”) under certain circumstances. For example, CMPD may be deemed to have custody when it is authorized by Clients to withdraw fees from Client accounts or to instruct the qualified custodian to pay Client expenses or if Client allows CMPD to initiate third-party transfers out of their Client accounts. CMPD will comply with all applicable Custody Rule requirements.

Item 16. Investment Discretion

CMPD does not provide discretionary investment advisory services. This means that CMPD is not provided full discretionary authority to select the timing, size, and identity of securities to buy and sell for the Client in the Client Account. Clients make the ultimate decision regarding the purchase or sale of investments in a Client Account, utilizing the tools provided by CMPD.

As discussed in Item 4, Clients may, in their sole discretion, decide to select a Model Portfolio, or decide to select a portfolio that is different from the Model Portfolio recommended by CMPD when opening an account or at any other time. If a Client selects a Model Portfolio other than the one recommended by CMPD, the composition of the resulting portfolio will differ from the one CMPD recommends based on the Client information (i.e. Client Inputs) CMPD uses as the basis for its recommendation for a portfolio. Clients may also elect to ignore CMPD’s recommendations and select securities from a curated list of Portfolio Securities at their sole discretion. After making a recommendation for an initial portfolio, CMPD will not actively monitor a Client’s Account or make any other recommendations regarding the composition of a particular Client’s portfolio.

Item 17. Voting Client Securities

In accordance with its fiduciary duty to clients and Rule 206(4)-6 of the Investment Advisers Act, CMPD has adopted and implemented written policies and procedures governing the voting of client securities. All proxies that CMPD receives will be treated in accordance with these policies and procedures.

CMPD will vote each proxy in accordance with its fiduciary duty to its Clients and will generally seek to vote proxies in a way that maximizes the value Client assets. CMPD may review recommendations provided by certain proxy voting services such as ISS and Glass Lewis, but CMPD will retain the ultimate responsibility to vote.

CMPD does not expect that it will be faced with any conflicts when voting proxies on behalf of clients. Nevertheless, if CMPD is faced with a material conflict of interest when voting a proxy, the Company has developed procedures to involve the CCO in the evaluation of the proxy vote decision under consideration. Generally, if CMPD identifies a material conflict of interest, the Company intends to follow the voting recommendation of a proxy voting service retained by CMPD at that time.

A copy of CMPD's proxy voting policies and procedures, as well as specific information about how CMPD has voted in the past, is available upon written request. Upon written request, Clients can also take responsibility for voting their own proxies.

Class Actions:

Where CMPD is authorized to direct Client participation in class actions, CMPD will determine whether Clients will (a) participate in a recovery achieved through class actions, or (b) opt out of the class action and separately pursue their own remedy. CMPD generally does not serve as the lead plaintiff in class actions because the costs of such participation typically exceed any extra benefits that accrue to lead plaintiffs.

Item 18. Financial Information

CMPD has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage client accounts.