



Your Trusted Financial AdvisorSM
COMPASS CAPITAL CORPORATION

Firm Brochure
(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Compass Capital Corporation. 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 Capital Corporation is an SEC registered investment advisor. Please note that registration does not imply a certain level of skill or training. Additional information about Compass Capital Corporation is available on the SEC's website at www.adviserinfo.sec.gov

October 16, 2019

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

Addition of new advisors. Updated AUM and number of clients.

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, www.CompassCapital.co 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 Capital Corporation was founded in 1984.

Compass Capital Corporation provides personalized financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Compass Capital Corporation is strictly a fee-only financial planning and 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. Through a fully-disclosed arrangement with Axos Bank, CCC may receive fees for bank deposits placed at Axos.

The firm is affiliated with Compass Holding Group, Incorporated (CHGI), a financial services holding company, Compass Portfolio Advisory Services Inc, a business to business registered investment advisor, and Compass Securities Corporation, an institutional-only FINRA Broker/Dealer that sells financial products or securities to qualified institutions. Investment advice is an integral part of financial planning. In addition, Compass Capital Corporation advises clients regarding cash flow, college planning, retirement planning, tax planning, divorce, and estate planning.

Investment advice is provided, with the client making the final decision on investment selection. Compass Capital Corporation does not act as a custodian of client assets. The client always maintains asset control. Compass Capital Corporation 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.

The initial meeting, which may be by telephone or in person, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Compass Holding Group, Incorporated is the 100% owner of Compass Capital Corporation. 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 Capital Corporation provides investment supervisory services, also known as asset management services; furnishes investment advice through consultation, and personal financial planning

On more than an occasional basis, Compass Capital Corporation furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning. As of June 30, 2019, Compass Capital Corporation manages approximately \$314,216,990 in assets for approximately 753 clients. Approximately \$314,216,990 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.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement and professional hours spent at \$175/hour. The fee range is typically \$500 to \$2,500 and is negotiable. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary. Follow-on implementation work is billed separately at the rate of \$175 per hour.

Advisory Service Investment Management Agreement

Most clients choose to have Compass Capital Corporation manage their assets in order to obtain ongoing in-depth advice. All aspects of the client's financial affairs are reviewed. 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. An Advisory Service Agreement may include: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; divorce; estate planning; and tax preparation, as well as the implementation of recommendations within each area.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

Investment Management Asset allocation fee schedule for Compass Asset Management Program and Compass Asset Allocation Program accounts managed by Compass Capital Corporation.

Minimum account size: \$150,000

Pricing:

No Load mutual funds, no transaction fee funds (NTF) when available, and securities and non-NTF (no transaction fee) mutual fund trades processed at cost which is typically \$30 per trade and .06/share. Clients may incur 12-b-1 fees per prospectus on all funds (which may or may not be paid to affiliates of Compass).

Breakpoint investment management fee are as follows:

<u>Assets In Account</u>	<u>Annual Fee</u>
\$0- \$150,000	1.25%
\$150,000-\$250,000	1.00%
\$250,000-\$500,000	0.95%
\$500,000-\$1,000,000	0.80%
<i>Greater than \$1,000,000</i>	0.75%

Example:

Compass Capital Investment Management Fee Calculation

Account size at quarter end			\$1,000,000
Days invested (90 or less)			90
Annual fee – blended from schedule	times	.9250%	\$9,250.00
	times	90/365 = .25	
Quarterly fee – blended/prorated			\$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.

Accounts custodied at FOLIO*fn* (member FINRA, SIPC):

FOLIO*fn* will charge up to .20% custody fee on your FOLIO*fn* account assets for accounts up to \$2 million, and .10% for assets over \$2 million and less than \$4 million, and .05% for accounts over \$4 million, and will not charge commissions for trades executed during regular trading windows. Trades executed outside regular trading windows will cost \$3.95 per security. Other service charges may apply for wires, etc.

FOLIO's Advisor Connexion

Through FOLIO*fn*'s Institutional Advisor Connexion program, we offer current and potential clients the ability to open new accounts with no minimums and very affordable pricing (25 basis point = .25%), through Compass Capital directly online. This important feature provides greater flexibility for people who want a real financial advisor that can understand your personal needs with the simplicity of opening and funding an account yourself. The technology provided by Folio Institutional provides a simple Unified Account Management (UMA) system that allows for multiple strategies in one account without trading fees. Clients appreciate the transparency and organized reporting this system provides.

With the advent of Robo-Advisors, which are exclusively online investment advisory firms offering simple portfolio allocations based on a basic risk assessment questionnaire, these accounts are highly standardized and offer no advisor interaction. Compass believes that there's still a need for the personal advisory connection especially when working with personal assets. Trust is the most valuable asset for any advisor and is earned over time but the Robo-Advisors faceless business model may be too impersonal for something like your investments. Our Compass managed allocations and portfolios are highly customizable and risk managed. Our solution balances the needs of a growing digitally mobilized generation of investors with the necessary personal advisory touch. This is a new platform that allows the advisor to engage with prospective clients virtually. It essentially allows advisors to compete with online "Robo-advisors" by providing client onboarding and a totally automated investment management platform.

The Advisor Connexion platform gathers the necessary data from the prospective client, provides a risk tolerance questionnaire customized by Compass, generates an investment policy statement based on the responses, scores the questionnaire based upon the Compass' specifications and puts the client's investments into a model based upon the scoring. The platform generates all documents, which the client can sign electronically, using Folio Institutional's proprietary electronic authorization process. Compass monitors and manages the investments (or outsources the management to third-party Folio managers) and the client can monitor everything through the client portal.

Accounts custodied at SEI Trust

Accounts with balances under \$50,000 will be charged a \$60 annual fee by SEI (paid quarterly, in arrears, \$15 per quarter). SEI will assess a \$75 fee when a client account is closed. Clients requesting disbursements from their account via wire will be charged a \$20 fee (per wire). There will be a \$20 fee for any overnight courier delivery of a paper check. There is no charge for disbursements via ACH transfer. There is a \$25 fee for any stop payment request. Should a client wish to hold non-SEI securities (excluding NTF mutual funds) in their SEI account, there is a minimum .15 basis points charge. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Investnet Program

Some clients may be utilizing Compass Capital Corporation asset management services through Compass Portfolio Advisory Services Inc and the Investnet 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 Investnet 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 Investnet 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.

Hourly Planning Engagements

Compass Capital Corporation provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements depends on the investment adviser representative, but is generally \$175.

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 Capital Corporation 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 Capital Corporation.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying Compass Capital Corporation 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 Capital Corporation will refund any unearned portion of the advance payment.

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

Fees and Compensation

Description

Compass Capital Corporation 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.

Financial plans are priced based on time spent according to the degree of complexity associated with the client's situation.

Fees are sometimes negotiable.

Fee Billing

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has 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.

Fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan.

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 Capital Corporation, 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 Capital Corporation.

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 Capital Corporation reserves the right to stop work on any account that is more than 30 days overdue. In addition, Compass Capital Corporation 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 Capital Corporation'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 Capital Corporation 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 Capital Corporation 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 Capital Corporation 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 Capital Corporation and their relatives, or relatives of existing clients.

The FOLIOfn Advisor Connexion program has no minimums.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Regarding mutual fund management of portfolios, Compass Capital Corporation utilizes state of the art investment analysis software, such as the Principia Pro Morningstar database. The software serves as the basis for a multiple screening process 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.

In some cases, Compass Capital Corporation 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.

In addition to the standard financial newspapers and magazines and trade newspapers and magazines, the company maintains an informal network of access to traders, market makers, and other investment advisors.

Investment Strategies

Compass Capital Corporation 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.

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 Registered Principals with Compass Securities Corporation, a wholly-owned subsidiary of Compass Holding Group Inc., the parent company of CCC. 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. Certain investment adviser representatives of Compass Capital Corporation (currently Bruce Winans) are also Registered Representatives of Compass Securities Corporation.

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 Capital Corporation, Compass Portfolio Advisory Services, Inc., 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 Capital Corporation, an SEC-registered investment adviser under Rule 204A-1, has adopted a **Code of Ethics** as of January 5, 2005 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 www.compasscapital.co.

Participation or Interest in Client Transactions

Officers and employees of Compass Capital Corporation 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 Capital Corporation 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 Capital Corporation, also owns Compass Securities Corporation, which is an institutional-only FINRA Broker/Dealer.

Compass Securities Corporation does not process retail business.

Best Execution

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

Soft Dollars

Compass Capital Corporation 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

Compass Capital reviews its client accounts on no less than a quarterly basis. 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. Based on the past experience of the firm, it would be unusual for the number of planning accounts assigned to any one advisor to exceed 10 cases at any one time. 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 Capital Corporation 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. In the event a client is introduced to Compass by either an unaffiliated or an affiliated solicitor, the Firm may pay that solicitor a referral fee in accordance with applicable state securities laws. Unless otherwise disclosed, any such referral fee is paid solely from Compass' investment management fee and does not result in any additional charge to the client. If the client is introduced to Compass by an unaffiliated solicitor, the solicitor is required to provide the client with Compass' written brochure(s) and a copy of a solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement. Any affiliated solicitor of Compass is required to disclose the nature of his or her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of the Compass written brochure(s) at the time of the solicitation..

In addition, Compass Capital Corporation has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate

planning attorneys, accountants, and similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Compass Capital Corporation 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 Capital Corporation.

A Compass affiliate, Compass Portfolio Advisory services Inc. may receive a fee for portfolio strategy design and access to the Envestnet TAMP platform.

Axos Bank may compensate CCC for deposits held by our clients.

Custody

SEC "Custody"

At no time does Compass Capital Corporation have custody of client cash or securities.

Account Statements

All assets are held at qualified custodians such as SEI Trust and Foliofn 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 Capital Corporation accepts limited discretionary authority to manage securities accounts on behalf of clients including reallocation and rebalancing of portfolios. Compass Capital Corporation 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 Capital Corporation 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 Capital Corporation 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 Capital Corporation does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Compass Capital Corporation will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

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

Privacy Notice

Compass Capital Corporation 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.

Certified Public Accountant (CPA): CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation,

management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services.

In addition to the *Code of Professional Conduct*, AICPA members who provide personal financial planning services are required to follow the *Statement on Standards in Personal Financial Planning Services* (SSPFPS).

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 Capital Corporation, 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 Capital Corporation, 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

Thomas J. Licciardello, CERTIFICATIONS

Date of birth: 1949

Educational Background:

- B.S., Education. Springfield College, Springfield, MA 1971
- M.S. Administration. University of Massachusetts, Lowell, Lowell, MA 1976
- Certified Financial Planner™, College for Financial Planning, Denver, CO 1988

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Business Experience:

- Licciardello Financial Services, Founder and Principal, 1991 to Present
- Compass Capital Corporation, investment adviser representative and Beneficial Shareholder, 1997 to Present

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Thomas Licciardello is supervised by Timothy Shanahan.
Timothy Shanahan's contact information: 781-535-6083,
Tim@compasscapital.co

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Walter K. Joly, CERTIFICATIONS

Date of birth: 1946

Educational Background:

- B.A., English/Philosophy, University of Connecticut, Storrs, CT, 1969

Business Experience:

- Compass Capital Corporation, investment adviser representative and Beneficial Shareholder, 1994 to Present
- Compass Securities Corporation, Registered Representative, 1994 to 2006
- Winslow, Evans & Crocker, Registered Representative, 2007 to 2008
- Compass Securities Corporation, Registered Representative, 2010 to 2014, FINRA Series 1, 63
- Capital Guardian, LLC, Registered Representative, 2014 to 12/31/14. FINRA Series 1, 63

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Walter Joly is supervised by Timothy Shanahan. Walter and Tim work in the same office.

Timothy Shanahan's Contact Information: 781-535-6083,
Tim@compasscapital.co

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Omar J. Mian, CERTIFICATIONS

Date of birth: 09/27/1977

Educational Background:

- University of Massachusetts, Boston-Accounting Major 1998-2001

Business Experience:

- Compass Capital Corporation, investment adviser representative, 2006 to Present, Beneficial Shareholder
- Compass Securities Corporation, Registered representative, 2009 to 2014, FINRA Series 6, 63, 65. Life, Accident and Health Insurance Licensed
- Winslow Evans and Crocker, Registered representative, 2007 to 2008
- Compass Securities Corporation, Registered representative, 2006 to 2007
- New England Financial, Registered representative, 2001 to 2004

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Omar Mian is supervised by Timothy Shanahan, President. Omar and Tim work in the same office.

Timothy Shanahan's Contact Information: 781-535-6083,
Tim@compasscapital.co

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Bruce Winans, CERTIFICATIONS

Date of birth: August 8, 1955

Educational Background:

- B.A., Geology/Business, Farleigh Dickenson University, Madison, NJ, 1977

Business Experience:

- Prophet Advisors, President. 2003 to Present
- Compass Securities Corporation, Registered Representative, 2003 to Present, FINRA Series 7, 63, 65
- Compass Capital Corporation, investment adviser representative, 2003 to Present, Beneficial Shareholder

Disciplinary Information: None

Other Business Activities: Life Insurance-wealth transfer, Captrio Co-Founder and Principal, third party marketing.

Additional Compensation: None

Supervision:

Bruce Winans is supervised by John Ahern. Bruce 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

Robert D. Fogarty, CERTIFICATIONS

Date of birth: 1961

Educational Background:

- B.A., Finance, Southeastern Massachusetts University, 1985
- College for Financial Planning, Denver, CO. Completed the CFP Professional Education Program in 1996.

Business Experience:

- Compass Capital Corporation, investment adviser representative, 1993 to Present. Life, Accident and Health Insurance Licensed
- Compass Securities Corporation, Registered Representative, 1993 to 2006

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Robert Fogarty is supervised by Timothy Shanahan. Robert and Tim work in the same office.

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

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Philip B. Boncaldo, CERTIFICATIONS

Date of birth: 10/18/1962

Educational Background:

- BA, Psychology, Boston College, Chestnut Hill, MA, 1984
- MBA, (Concentration in Investment Finance) Bentley College Graduate School, Waltham, MA, 1986
- Certified Financial Planner™, College for Financial Planning, Denver, CO, 1990
- CIMC, Institute For Certified Investment Management Consultants, 1997

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Business Experience:

- Compass Capital Corporation, investment adviser representative, 2000 to Present
- B & D Property Management Company, Partner, 1989-Present
- Boncaldo's Gentlemen's Barbershop, Owner and Master Barber, 2006-Present
- The Spa at Boncaldo's LLC., Partner, 2010-Present

Disciplinary Information: None

Other Business Activities: Personal real estate management and investment

Additional Compensation: Real estate, barbershop/spa

Supervision:

Philip Boncaldo is supervised by Tim Shanahan.
Tim Shanahan contact information: 781-535-6083,
Tim@compasscapital.co

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

David Morgan, CERTIFICATIONS

Date of birth: December 27, 1953

Educational Background:

- Certified Financial Planner™, Boston University, Boston, MA, 2004
- B.S., Pharmacy, Mass College of Pharmacy, Boston, MA, 1978
- B.S., Zoology, University of Massachusetts, Amherst, MA, 1975

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Business Experience:

- Compass Capital Corporation, investment adviser representative, 2009 to Present, FINRA Series 65
- LPL Financial, Financial Planning Intern, 2006 to 2008
- Apothecare Pharmacies, consultant, 2009 to present
- Massasoit Community College, Instructor, 2007 to 2010

Professional Designations: CFP®

Disciplinary Information: none

Other Business Activities: none

Additional Compensation: none

Supervision:

Name David Morgan is supervised by Timothy Shanahan.
Tim Shanahan's contact information: 781-535-6083,
Tim@compasscapital.co

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Troy A. Knowlan, CERTIFICATIONS

Date of birth: September 19, 1966

Educational Background:

- Accounting Program, University of Maine, Augusta, 1995
- Certified Financial Planner™, College for Financial Planning, Denver, CO, 2001

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Business Experience:

- Compass Capital Corporation, investment adviser representative, 2001 to Present
- O'Connor Auto Group, CFO, 1987 to Present

Professional Designations: CFP®, FINRA Series 63, Life & Health Agent (Maine)

Disciplinary Information: None

Other Business Activities: CFO, O'Connor Auto Group

Additional Compensation: O'Connor Auto Group

Supervision:

Troy Knowlan is supervised by Tim Shanahan, President of Compass Securities.

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

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None