



Client Brochure

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Chas P. Smith & Associates, PA, CPA's conducts its advisory business under the name CPS Investment Advisors (hereinafter referred to as CPS). This Brochure provides information about the qualifications and business practices of CPS. If you have any questions about the contents of this Brochure, please contact us at (863) 688-1725. 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.

CPS is a registered investment adviser. The registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

On July 28, 2010, the United States Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated March 28, 2025, is prepared according to the SEC’s requirements and rules.

This Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. The date of our last update of our brochure was July 29, 2024. The following items have been updated since July 29, 2024:

- Item 4 has been updated to reflect current assets under management.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Leila Shaver, Chief Compliance Officer at (770) 462-2118 or compliance@myrialawyer.com.

Additional information about CPS is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with CPS who are registered, or are required to be registered, as investment adviser representatives of CPS.

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Item 4 – Advisory Business

CPS has been in the advisory business since 1989. CPS had assets under management of \$2,656,293,459 as of 12/31/2024. The Principals of CPS are Peter C. Golotko, Michael A. Riskin, Nolen B. Bailey, Anthony M. Corrao and Erica M. Lupercio.

ERISA Accounts: ADVISOR is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, ADVISOR may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset ADVISOR's advisory fees.

Direct

At the initial review of a client's portfolio, CPS may give advice on all investments owned by the client. CPS has discretionary authority (with respect to the purchase and sale of securities) and provides ongoing supervisory services for each account.

Investment Supervisory Services: CPS provides Investment Supervisory Services, defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. Through personal discussions, CPS determines the client's goals and objectives. CPS then develops a client's personal investment policy and creates and manages a portfolio based on that policy. CPS provides this service to individuals, trusts, estates, charitable organizations, pension and profit-sharing plans, and corporations. CPS will manage advisory accounts on a discretionary basis. Account supervision is guided by the stated objectives of the client.

CPS Investment Advisors 401(k) Services: CPS offers Investment supervisory services through its 401(k) Daily Valuation program. This is a service CPS offers to companies. CPS hires a third-party administrator to perform accounting and document preparation functions. CPS handles all the investment decisions. CPS does not provide reports to the Participants.

401(k) Pilot Services: CPS offers Investment supervisory services through its 401(k) Pilot program. This is a limited-service CPS Offers to participants in company 401(k) plans. CPS develops a client's personal investment policy and manages the investments in the 401(k) account through the Plan Administration website. CPS does not provide reports to the Participants. Participants can view reports and activity online through the Plan Administration website.

403(b) Services: CPS offers Investment supervisory services through its 403(b) program. This is a limited-service CPS Offers to participants in public 403(b) plans. CPS develops a client's personal investment policy and manages the investments in the 403(b) account through the employees account on the ASPire Financial Services website. CPS does not provide reports to the Participants. Participants can view reports and activity online through the ASPire Financial Services website.

Personal Financial Counseling: CPS also provides advice in the form of a Financial Plan. Clients purchasing this service will receive a written financial plan, providing the client with a detailed financial plan designed to assist in achieving their stated financial goals and objectives.

In general, the financial plan will address the following areas of concern:

PERSONAL: Family records, budgeting, personal liabilities, estate information and financial goals.

TAX & CASH FLOW: Income tax and spending analysis and planning for past, current and future years. CPS will discuss the impact of various investments on a client's current income tax and future tax liability.

DEATH & DISABILITY: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.

RETIREMENT: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.

INVESTMENTS: Analysis of investment alternatives and their effect on a client's portfolio.

CPS gathers the required information through in-depth personal interviews. The information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should the client choose to implement the recommendations contained in the plan, CPS suggests the client work closely with his/her attorney, accountant, insurance agent, and/or investment advisor. Implementation of financial planning recommendations is entirely at the client's discretion.

Clients can also receive investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. CPS also provides specific consultation and administrative services regarding investment and financial concerns of the client. Additionally, CPS provides advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, insurance, and/or annuity advice. Consulting recommendations are not limited to any specific product or service offered by a broker dealer or insurance company. All recommendations are of a generic nature.

CPS holds seminars to help educate people on how to achieve financial independence by teaching them the fundamentals of investing and presenting different scenarios to show the effects of saving and spending money more wisely. These seminars teach direct instruments and mutual fund investing. In both situations, we discuss costs and fees associated with each as well as risk and turnover. There is no cost for the seminars. Investment advice is not tailored to the attendees.

CPS offers advice on various real estate investments including syndicated partnerships. CPS' advice relates to the evaluation of these securities.

A direct client agreement may be canceled by the client at any time for any reason upon receipt of 30 days' written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Cash Management Services

CPS provides Cash Management Services. This is a limited-service CPS offers to individuals, corporations, and business owners. CPS handles all the investment and reinvestment of assets in the Client's account(s) in securities and cash or cash equivalents. The account(s) managed by the cash management services offering are listed within the addendum to the Client's personal investment policy statement. Client agrees to notify Advisor promptly of any significant change in the information provided by the Client or any other significant change in Client's financial circumstances or investment objectives that might affect the way Client's account(s) should be invested. The client also agrees to provide Advisor with such additional information as Advisor may request from time to time to assist in advising Client. Advisor's authority under this agreement will remain in effect until changed or terminated by Client in writing.

CPAlliance™

CPS has discretionary authority (with respect to the purchase and sale of securities) and provides ongoing supervisory services for each account. The Certified Public Accounting/Registered Investment Advisory firm (member) participating with CPS is responsible for educating the client with respect to the types of investments available, assisting each client in determining the amount of risk versus return in various investment vehicles, and assisting each client in making an asset allocation between those various investments. It is the responsibility of the participating members to monitor the performance of the account, as it relates to meeting the objectives of the client and the asset allocation. The members will meet with the client to continually assess the client's risk tolerance and change the asset allocation as necessary. The participating member has the discretionary authority to terminate the client's contract with CPS without the client's consent. CPS and the participating members have separate contracts with the client.

CPAlliance™ Investment Supervisory Services: CPS offers investment supervisory services, through its alliance program to members. This program is called CPAlliance™ (hereinafter referred to as “Program”). These members that participate in CPS' Program are not affiliated with CPS by common control or ownership. Please refer to CPAlliance™ member's Form ADV for the additional services that they provide.

CPAlliance™ 401(k) Services: CPS offers investment supervisory services through its CPAlliance™ program to members for the 401(k) Daily Valuation service. These members that participate in CPS' program are not affiliated with CPS by common control or ownership. This is a service CPS offers to companies. CPS hires a third-party administrator to perform accounting and document preparation functions. CPS handles all of the investment decisions. Please refer to CPAlliance™ member's Form ADV for the additional services that they provide. CPS does not provide reports to the Participants.

CPAlliance™ 401(k) Pilot Services: CPS offers investment supervisory services through its CPAlliance™ program to members. These members that participate in CPS' program are not affiliated with CPS by common control or ownership. This is a limited-service CPS offers to participants in company 401(k) plans. CPS develops a client's personal investment policy and manages the 401(k) account through the Plan Administration website. CPS does not provide reports to the Participants. Participants can view reports and activity online through the Plan Administration website. Please refer to CPAlliance™ member's Form ADV for the additional services that they provide.

A CPAlliance™ client agreement may be canceled by the client or the participating member at any time for any reason upon receipt of 30 days' written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

CPAlliance™ Separately Managed Account Program (CPAlliance™ SMA)

CPS offers discretionary and non-discretionary management services to members of the CPAlliance™ program. This program is called CPAlliance™ SMA.

Accounts and sub-accounts in the CPAlliance™ SMA program managed by CPS on a discretionary basis will be managed as described under “CPAlliance Investment Supervisory Services”.

CPS offers separate account billing and reporting services for non-managed accounts and sub-accounts in the CPAlliance™ SMA program. Accounts in the “billing and reporting services” option are not regulatory assets under management for CPS Investment Advisors. It is the responsibility of the participating members to monitor the performance of the account, as it relates to the objectives of the client and the asset allocation. The members will meet with the client to continually assess the client's risk tolerance and change the asset allocation as necessary. The participating member has the discretionary authority to terminate the member's contract with CPS without the client's

consent. The participating members have discretionary authority with respect to the purchase and sale of securities. The participating member has discretionary authority to engage other money managers. The participating member has discretionary authority to allocate funds to separately managed accounts and sub-accounts managed by CPS on a discretionary basis.

Item 5 – Fees and Compensation

All fees are subject to negotiation. All investment fees are calculated on assets under management and are not charged based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client [SEC Rule 205 (a)(1)]. Fees for financial planning and consulting will be charged either on an hourly basis or on a fixed fee basis. CPS may waive the financial planning and consulting fee for those clients who select CPS Investment Advisors for money management services.

The specific way fees are charged by CPS is established in a client's written agreement with CPS. CPS will generally bill its fees in advance on a quarterly basis. Fees and quarter end account values are rounded to the nearest dollar. Clients may also elect to be billed directly for fees or to authorize CPS to directly debit fees from client accounts. Management fees shall not be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

CPS fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to CPS fee, and CPS shall not receive any portion of these commissions, fees, and costs.

Clients will be invoiced in advance, at the beginning of each calendar quarter, based upon the month-end values (market value or fair market value in the absence of market value, plus any margin balance) of the client's account during the previous quarter. The value of the portfolio is determined on the nearest valuation date preceding the end of the quarter, which valuation date is defined as the last day of the month.

Management of the account and the fee commences upon the signing of the agreement, unless otherwise agreed upon. If the agreement commences other than at the beginning of a quarter, a pro rata charge will be made for the initial period the portfolio is under the advisor's management prior to the beginning of a quarter on the amount agreed upon.

Management fees do not include wire fees, margin interest, overnight or registered postage charges, mutual fund sales charges, IRA custodial fees or transaction charges. These fees are charged to the client directly by the mutual fund or custodian when incurred.

Item 12 further describes the factors that CPS considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

All fees paid to CPS for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales

charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without the services of CPS. In that case, the client would not receive the services provided by CPS which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by CPS to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. When appropriate to the needs of the client, CPS may recommend the use of trading (securities sold within 30 days), margin strategies, or option writing. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated tolerance for risk.

Direct

Investment Supervisory Services:

The annual fee for investment supervisory services will be charged as a percentage of assets under management, according to the schedule below:

<u>Assets under management</u>	<u>Annual fees%</u>
The portion of assets between \$0-\$3,000,000	1.500%
The portion of assets between \$3,000,001-\$5,000,000	1.000%
The portion over \$5 million	0.750%

CPS Investment Advisors 401(k) Services:

The annual fee for investment supervisory services will be charged as a percentage of assets under management, according to the schedule below:

<u>Assets under management</u>	<u>Annual fees%</u>
The portion of assets up to \$1,000,000,000	1.000%

401(k) Pilot Services:

The annual fee for investment supervisory services will be charged as a percentage of assets under management, according to the schedule below:

<u>Assets under management</u>	<u>Annual fees%</u>
The portion of assets between \$0-\$3,000,000	1.500%
The portion of assets between \$3,000,001-\$5,000,000	1.000%
The portion of assets over \$5 million	0.750%

403(b) Pilot Services:

The annual fee for investment supervisory services will be charged as a percentage of assets under management, according to the schedule below:

<u>Assets under management</u>	<u>Annual fees%</u>
The portion of assets up to \$99,000,000	1.500%

Cash Management Services

The annual fee for cash management services will be charged as a percentage of assets under management, according to the schedule below:

<u>Assets under management</u>	<u>Annual fees%</u>
The portion of assets up to \$99,000,000	0.500%

Consulting Fees: Consulting fees will be charged:

As a fixed fee, typically ranging from \$500 and up, depending on the nature and complexity of each client's circumstances and upon mutual agreement with the client. 50% of this fee may be due upon the inception of the advisory relationship, with the balance due upon completion of the consulting service; and/or

CPAlliance™

CPAlliance™ Investment Supervisory Services:

The annual fee for investment supervisory services will be charged as a percentage of assets under management, according to the schedule below:

Assets under management	CPA Firm	CPS	Total
The portion of assets between \$0-\$3,000,000	0.750%	0.750%	1.500%
The portion of assets between \$3,000,001-\$5,000,000	0.500%	0.500%	1.000%
The portion over \$5 million	0.375%	0.375%	0.750%

CPAlliance™ 401(k) Services:

The annual fee for investment supervisory services will be charged as a percentage of assets under management, according to the schedule below:

Assets under management	CPA Firm	CPS	Total
The portion of assets up to \$1,000,000,000	.500%	.500%	1.000%

CPAlliance™ 401(k) Pilot Services:

The annual fee for investment supervisory services will be charged as a percentage of assets under management, according to the schedule below:

Assets under management	CPA Firm	CPS	Total
The portion of assets between \$0-\$3,000,000	0.750%	0.750%	1.500%
The portion of assets between \$3,000,001-\$5,000,000	0.500%	0.500%	1.000%
The portion over \$5 million	0.375%	0.375%	0.750%

CPAlliance™ Separately Managed Account Program (CPAlliance™ SMA) Services:

The annual fee for billing and reporting services for non-managed accounts in the CPAlliance™ SMA program will be 0.25%.

Fees for discretionary investment supervisory services for accounts in the CPAlliance™ SMA program will be charged as described under "CPAlliance Investment Supervisory Services".

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

CPS does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) or side-by-side management.

Item 7 – Types of Clients

CPS provides portfolio management services to high-net-worth individuals, individuals, corporations, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, municipalities, and other U.S. institutions.

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

CPS utilizes several different sources for its research and investment process, including financial publications and news, Value Line, Morningstar, annual reports, online research services, and financial newsletters, among many others. None of these services or products is obtained by the firm on a soft dollar basis.

Our investment philosophy at CPS is to stick to our value-driven premise that buying securities when they are undervalued is associated with a high probability of achieving above-average returns in the future, and of course, buying securities when they are overvalued will result in a high probability of achieving lower than expected returns. Our philosophy is based around fundamental analysis and that companies trading in a range lower than their historical average will likely achieve a higher probability of above-average returns.

Our investment strategy is to identify companies with strong balance sheets, dependable earnings, a history of increasing dividends, significant overseas exposure and a dominate player in their respective industry. These companies have competitive advantages over their competitors; this allows them to withstand the volatility the market can provide. We buy with a margin of safety and monitor until such a time the company is overvalued, at which time it may be sold, and the proceeds reinvested in another undervalued company. We understand the importance of diversification, therefore, properly diversifying all Client Accounts can likely lead to better performance over time. In areas where market research is limited, we may elect to incorporate mutual funds, index funds, or exchange traded funds to adequately diversify the Client Account. Our view is long-term, and our clients understand this position. Short-term movements in the market sometimes in response to non-factual information, either positive or negative, therefore having a long- term approach rids the Account of short-term fluctuations. This process takes time, effort and experience. It requires the use of expertise and good judgment in a qualitative, as well as quantitative process, making it as much of an art as it is a science.

Investing in securities involves the risk of loss that clients should be prepared to bear. CPS does not guarantee the future performance of the Account or any specific level of performance, the success of any investment decision or strategy that CPS may use, or the success of Advisor's overall management of the Account. Client understands that investment decisions made for Client's Account by CPS are subject to various market, currency, economic, political and business risks, and that those investment decisions will not always be profitable. CPS will manage only the securities, cash and other investments held in the Client's Account and in making investment decisions for the Account, CPS will not consider any other securities, cash or other investments owned by Client. Except as may otherwise be provided by law, CPS will not be liable to Client for (i) any loss that Client may suffer by reason of any investment decision made or other action taken or omitted in good faith by CPS with that degree of care, skill, prudence, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (ii) any loss arising from CPS' adherence to Client's instructions; or (iii) any act or failure to act by the Custodian, any broker or dealer to which CPS directs transactions for the Account, or by any other third party. This limitation on liability is valid, however, only to the extent it does not violate federal and state securities laws. Federal and state securities laws impose liabilities under certain circumstances on people who nonetheless act in good faith, and therefore do not constitute a waiver or limitation of any right Client has under such laws.

Option writing: Although rarely, CPS may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a

certain date. An option, just like a stock or bond, is a security. An option is also a derivative because it derives its value from an underlying asset.

The two types of options are calls and puts: A call gives CPS the right to buy an asset at a certain price within a specific period. CPS will buy a call if it's been determined that the stock will increase substantially before the option expires. A put gives CPS the holder the right to sell an asset at a certain price within a specific period. CPS will buy a put if CPS has determined that the price of the stock will fall before the option expires.

CPS may use options to speculate on the possibility of a sharp price swing. CPS may also use options to "hedge" a purchase of the underlying security; in other words, CPS may use an option purchase to limit the potential upside and downside of a security CPS has purchased for your portfolio.

CPS may use "covered calls," in which CPS sells an option on a security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price. A risk of covered calls is that the option buyer does not have to exercise the option, so that if CPS wanted to sell the stock prior to the end of the option agreement, CPS must buy the option back from the option buyer, for a possible loss.

CPS may use a "straddle," in which CPS purchases two or more option contracts (for example, a call option that you buy and a call option that you sell) for the same underlying security. This effectively puts the client on both sides of the market, but with the ability to vary price, time, and other factors. A risk of spreading strategies is that the ability to fully profit from a price swing is limited.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 10 – Other Financial Industry Activities and Affiliations

CPS is affiliated with a Certified Public Accounting firm actively involved in personal financial counseling and traditional income tax and accounting services. The firm's name is CPS Group CPA's, PA. The owners of CPS have a majority ownership (100%) of the company CPS Group CPA's, PA.

CPAlliance™ Insurance Services, Inc. is an Independent Insurance Agency that sells Life, Health & Disability insurance for a commission. The owners of CPS have a majority ownership (100%) of the company CPAlliance™ Insurance Services, Inc.

CPS is the owner of CPS Tax Lien Income Fund I LLC (formally CPAlliance™ Financial Services, an inactive business entity). The owners of CPS have a majority ownership (100%) of the company CPS Tax Lien Income Fund I LLC.

CPAlliance™ Training Seminars: CPS offers a two-day training seminar for CPA firms to learn how to add money management to their financial planning services. The cost of the training is \$2,500. This is a deposit which will be returned to the CPA firm upon reaching \$10 million in assets under management.

CPS also offers Continuing Professional Education Seminars for CPAlliance™ members. This program qualifies for CPE credit. The cost of each seminar may vary depending on the topic & program outline.

CPS holds an annual Roundtable conference for its CPAlliance™ members. Conference sponsors included Fidelity Investments, iShares/Blackrock, ASpire Financial Services, Matthews Benefit Group, and other third parties.

Item 11 – Code of Ethics

CPS has adopted a Code of Ethics expressing the firm’s commitment to ethical conduct for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at CPS must acknowledge the terms of the Code of Ethics annually, or as amended.

The Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of the employees of CPS will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

In addition, the Code requires pre-clearance of many transactions and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between CPS and its clients.

Associated with CPS or its associated persons may buy or sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of CPS that no person employed by CPS shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on the investment decision of advisory clients. CPS buys and sells securities for its owners, employees, and their immediate families that it also recommends to clients. At times, CPS may buy investments for its proprietary accounts that it does not buy for its clients.

All securities traded in affiliated accounts are subject to a blackout period where a security that has been purchased or sold for a client account may not be purchased or sold for an affiliated account during the 3-day period before and after the client purchase or sale date.

All principal individuals and/or employees of CPS are required to comply with all applicable federal and state securities laws, rules, and regulations. The Adviser’s Code of Ethics further includes the firm’s policy prohibiting the use of material non-public information. If any person of CPS violates CPS’ internal controls and/or the applicable federal or state laws, rules & regulations, then that person will be subject to disciplinary action ranging from verbal reprimand to termination of employment, depending on the nature, seriousness, and repetition of the violation.

CPS clients or prospective clients may request a copy of the firm’s Code of Ethics by contacting Leila Shaver, Chief Compliance Officer at (770) 462-2118 or compliance@myrialawyer.com.

Item 12 – Brokerage Practices

Because CPS does not have the discretionary authority to determine the broker dealer to be used or the commission rates to be paid, clients must direct CPS as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that CPS may not have authority to negotiate commissions or obtain volume discounts and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to other clients. CPS does not have any formal or informal soft-dollar arrangements. Clients will receive monthly and/or quarterly statements from their broker-dealer/custodian. CPS will provide clients with reports as contracted for at the inception of the advisory relationship.

CPS participates in Fidelity Institutional Wealth Services (FIWS) which is offered to independent investment advisers by Fidelity Investments, an NASD registered broker-dealer. CPS utilizes the services of Fidelity Institutional Wealth Services (FIWS) program sponsored by Fidelity Brokerage Services, LLC (Fidelity). While there is no direct linkage (except in certain circumstances) between the investment advice given to clients and CPS' participation in the FIWS program, economic benefits that are received by CPS would not be received if CPS did not give investment advice to clients. These benefits include: a dedicated trading desk that services FIWS participants exclusively, a dedicated service group and an account services manager dedicated to CPS' accounts, access to a real-time order matching system, electronic download of trades, balances and positions in FIWS's portfolio management software, access, for a fee, to an electronic interface with FIWS's software, duplicate and batched client statements, confirmations and year-end summaries, the ability to have advisory fees directly debited from client accounts (in accordance with federal and state requirements), a quarterly newsletter, access to Fidelity mutual funds, access to www.wealthscape.com, a Fidelity Brokerage information web site, access to over 6000 mutual funds NOT affiliated with Fidelity, and the ability to have loads waived for CPS clients who invest in certain Fidelity loaded funds, when certain conditions are met and maintained. FIWS also financially co-sponsors an annual conference for CPS' CPAlliance™ program to enhance the education and skills of the CPAlliance™ members.

Clients in need of brokerage or custodial services will have Fidelity Investments recommended to them. As part of the FIWS program, CPS receives benefits that it would not receive if it did not offer investment advice.

CPS has a policy to make whole all accounts that have trading errors. CPS will not penalize the account for the trading error. All errors are moved to a trade error account for correction. Profits are donated to a charity chosen by CPS and losses are absorbed by CPS.

CPS may, from time to time, aggregate client trades using Block Orders. If this strategy is used, all clients within the aggregate-filled trade will receive the same price. Aggregate trades are used to move in and out of a particular investment quickly which could improve the execution of the trade.

Regarding thinly traded securities and partial fill executions of volume and/or batched trades, CPS will use a random sampling method or Orion software to ensure fair and equitable treatment over time. Allocations for partial fills will be made using a random number sequence or the Orion software. This random sampling method may be changed if a different method is more appropriate.

Financial Planning - Consulting: These clients will be required to select their own broker-dealers and/or insurance companies for the implementation of financial planning and/or consulting recommendations. CPS may recommend any one of several brokers (including but not limited to Fidelity). CPS clients must independently evaluate these brokers before opening an account. The factors considered by CPS when making this recommendation are the broker's ability to provide professional services, CPS' experience with the broker, the broker's reputation, and the broker's financial strength, among other factors.

Seminars: Due to the nature of this service, CPS does not recommend broker-dealers to these clients.

Class Action & Legal Proceedings: CPS has teamed with Broadridge Financial Solutions to assist clients with class action litigation services. Broadridge Financial Solutions is the industry leader in class action litigations in an industry growing in volume and complexities. They have dedicated technology, industry expertise and security to ensure our clients maximize litigation opportunities. This partnership will provide the solutions to make the monitoring and filing process more efficient. It will also alleviate a client's need to sign paperwork and respond to filing notices. Broadridge will be handling all filing procedures, allowing the client and advisor to focus on the client's plan. This valuable service is at no upfront cost. A small percentage of the recovered amount is deducted as their fee.

Item 13 – Review of Accounts

Portfolio Management: Portfolios are reviewed on a continuous and regular basis. Portfolio management accounts are formally reviewed in their entirety initially upon engagement and quarterly, semi-annually, or annually, as contracted for at the inception of the advisory relationship. Periodic reviews of accounts are conducted on a more frequent basis to accommodate additions to cash, unusual price movements, and any investment objective change by the client. CPAlliance™ clients are only contacted by the participating advisory firm unless requested by the participating firm or end client.

Financial Planning - Consulting: These client accounts are reviewed as contracted for at the inception of the advisory relationship.

Item 14 – Client Referrals and Other Compensation

CPAlliance™ EZ is a referral arrangement. Each participating firm or person signs a Solicitation Agreement, and their client signs a Disclosure Statement and Acknowledgement which allows CPS to manage the client and their assets and pays the participating firm or person a portion of the quarterly fee collected. The owners of CPS have a majority ownership (100%) of the company CPAlliance™.

CPAlliance™ Training Seminars: CPS offers a two-day training seminar for CPAlliance™ members to learn how to add money management to their financial planning services. The cost of the training is \$2,500. This is a deposit which will be returned to the CPAlliance™ member upon reaching \$10 million in assets under management. CPS also offers Continuing Professional Education Seminars for CPAlliance™ members. This program qualifies for CPE credit. The cost of each seminar may vary depending on the topic & program outline.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains the client's investment assets. CPS urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

CPS has custody over certain client's funds and securities and therefore is required to have an annual surprise audit by an independent public accountant.

Item 16 – Investment Discretion

CPS usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and number of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the client account. Any limitations on this discretionary authority shall be included in this written authority statement.

Clients may change/amend these limitations as required. Investment guidelines, restrictions and any amendments shall be submitted in writing.

When selecting securities and determining amounts, CPS observes the investment policies, limitations, and restrictions of the clients for which it advises.

Item 17 – Voting *Client* Securities

Unless the parties otherwise agree in writing, CPS shall have no obligation or authority to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held by an Account. The

Client expressly retains authority and responsibility for, and CPS is expressly precluded from rendering any advice or taking any action with respect to, the voting of any such proxies.

If the account is maintained on behalf of a plan subject to the Employee Retirement Income Security Act of 1974 ("ERISA") or similar government regulations, Client represents regardless of the plan document, that the Client expressly retains the authority and responsibility for, and CPS is expressly precluded from rendering any advice or taking any action with respect to, the voting of such proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about CPS' financial condition. CPS has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of bankruptcy proceedings.

CPS will not charge more than \$1200 in advance for work that cannot be completed within six months.



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March 28, 2025

This Brochure Supplement provides information about **Peter C. Golotko, CPA/PFS, MBA** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Peter C. Golotko is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Peter C. Golotko, CPA/PFS, MBA, born April 10, 1968.

Peter has been Partner/Director of Chas P. Smith & Associates, P.A., CPA's since January 1998.

He earned his B.S. in Business Administration-Accounting in 1990 and his Masters in Business Administration (MBA) in 1996, both from Florida Southern College.

He became a Certified Public Accountant (CPA) in 1995, but has had public accounting experience since 1990. 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, minimum experience levels, 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 each year. 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, maintain client confidentiality, disclose to the client any commission or referral fees, and service the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

Peter received a Certificate of Education Achievement from the AICPA for Financial Planning in 1995 and has been a Personal Financial Specialist (PFS) since 1995. The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's *Code of Professional Conduct*, and is encouraged to follow AICPA's *Statement on Responsibilities in Financial Planning Practice*. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

Peter passed the Series 65 in 1998.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Peter C. Golotko is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Peter C. Golotko receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Michael Riskin and Nolen Bailey in a supervisory role to monitor the advice given to clients. Michael can be reached at MRiskin@cpsinvest.com and Nolen can be reached at Nolen@cpsinvest.com.



Supplement for Michael A. Riskin
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March 28, 2025

This Brochure Supplement provides information about **Michael A. Riskin, CPA/PFS, CFP®, MST** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Michael A. Riskin is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Michael A. Riskin, CPA/PFS, CFP®, MST, born June 27, 1974.

Michael has been a Partner of Chas P. Smith & Associates, P.A., CPA's since July 2017. He also serves as the Corporate President, a role he assumed in January 2025. He served as Director of Taxation for CPS Group CPAs, PA from February 2009 through December 2015.

He earned his B.S. in Business Administration-Accounting in 1996 from Lehigh University and his Masters in Taxation (MST) in 2000 from Florida International University.

He became a Certified Public Accountant (CPA) in 2002 but has had public accounting experience since 1996. 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, minimum experience levels, 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 each year. 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, maintain client confidentiality, disclose to the client any commission or referral fees, and service the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

Michael has been a Personal Financial Specialist (PFS) and a Certified Financial Planner (CFP®) since 2010. The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's *Code of Professional Conduct*, and is encouraged to follow AICPA's *Statement on Responsibilities in Financial Planning Practice*. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

The CERTIFIED FINANCIAL PLANNER (CFP®) designation is a [professional certification](#) mark for [financial planners](#) conferred by the [Certified Financial Planner Board of Standards](#) (CFP® Board) in the United States, and by 25 other organizations affiliated with Financial Planning Standards Board (FPSB). To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, and pay an ongoing certification fee.

Michael has been issued his Series 65 since 2010 upon passing the CFP® exam.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Michael A. Riskin is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Michael A. Riskin receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Michael A. Riskin in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



Supplement for Nolen B. Bailey
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March 28, 2025

This Brochure Supplement provides information about **Nolen B. Bailey** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Nolen B. Bailey is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Nolen B. Bailey, CFP®, CRPS®, ARPC, born July 20, 1984.

Nolen became a Partner of Chas P. Smith & Associates, P.A., CPA's on July 1, 2020. He also serves as the Corporate Vice President/Secretary/Director. Nolen has been Regional Director of Retirement Plan Services at CPS Investment Advisors, since March 2011.

He earned his B.S. in Business Administration – Finance concentration with a minor in Economics in 2007 from Florida Southern College. Nolen obtained his Series 65 license as a Registered Investment Advisor Representative in 2011.

The CERTIFIED FINANCIAL PLANNER™ (CFP®) designation is a [professional certification](#) mark for [financial planners](#) conferred by the [Certified Financial Planner Board of Standards](#) (CFP® Board) in the United States, and by 25 other organizations affiliated with Financial Planning Standards Board (FPSB). To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, and pay an ongoing certification fee.

He obtained the Chartered Retirement Plans Specialist (CRPS®) designation from the College for Financial Planning in 2015. The CRPS® is a professional designation awarded by the College for Financial Planning to individuals who specialize in creating, implementing and maintaining retirement plans for businesses. They must pass an exam demonstrating their expertise. Successful applicants earn the right to use the CRPS® designation with their names for two years. Every two years, CRPS professionals must complete 16 hours of continuing education and pay a nominal fee to continue using the designation.

He obtained the Accredited Retirement Plan Consultant (ARPC) designation from the Society of Professional Asset-Managers and Record Keepers in 2014. The Accredited Retirement Plan Consultant (ARPC) designation is awarded to sales and marketing professionals who have demonstrated the knowledge required to help employers sponsor plans that enable employees to effectively save and plan for retirement. The ARPC designation program is accredited by the National Commission for Certifying Agencies (NCCA). Accreditation provides independent third-party validation that the ARPC program meets or exceeds standards regarding its purpose, structure, governance, psychometric foundation, policies and procedures. NCCA accreditation meets the requirements of the NASAA Model Rule on the Use of Senior Specific Certifications and Professional Designations.

Nolen received his Insurance License from the Florida Department of Financial Services in 2015 for Life including Variable Annuities and Health.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Nolen B. Bailey is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Nolen B. Bailey receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Nolen B. Bailey in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



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March 28, 2025

This Brochure Supplement provides information about **Anthony M. Corrao, CFP®** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Anthony M. Corrao is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Anthony M. Corrao, CFP®, born September 28, 1981

Anthony became a Partner of Chas P. Smith & Associates, P.A., CPA's on January 1, 2023. Anthony has been employed with Chas P. Smith & Associates, P.A., CPA's since June 2010. His role as a financial advisor is to provide outstanding customer service to his clients. Previously, Anthony was a portfolio trader and analyst with the firm.

He earned his B.S. in Finance in 2003 from The Florida State University.

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Anthony passed the Series 65 in 2012 and attained the CFP® designation in 2016.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Anthony M. Corrao is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Anthony M. Corrao receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Anthony M. Corrao in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



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March 28, 2025

This Brochure Supplement provides information about **Richard D. Bernard, MBA** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Richard D. Bernard is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Richard D. Bernard, MBA, CFP®, was born June 27, 1961

Richard has been employed as a Financial Advisor by CPS Investment Advisors since February 21, 2017. Prior to his employment with CPS Investment Advisors, Richard worked from 1983 – 2016 at the Polk County Sheriff's Office in Florida.

Richard earned his B.A. in Organizational Management from Warner University in 2005 and his Masters of Business Administration (MBA) from Florida Southern College in 2008. The Florida Southern College MBA is an internationally-recognized graduate level program designed to develop the skills required for careers in business and management. The curriculum includes a comprehensive selection of business related topics, including Economics, Marketing, Qualitative & Quantitative Analysis, Business Finance, Business Law, Ethics, and Leadership.

In 2022 Richard earned the CERTIFIED FINANCIAL PLANNER™ (CFP®) designation. The CFP® designation is a professional certification mark for financial planners conferred by the Certified Financial Planner Board of Standards (CFP® Board) in the United States, and by 25 other organizations affiliated with Financial Planning Standards Board (FPSB). To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, and pay an ongoing certification fee.

Richard is a Florida Retirement System (FRS) retiree and former DROP participant. Richard specializes in retirement planning for government/public sector employees and retirees.

Richard obtained his Series 65 license as a Registered Investment Advisor Representative in 2017.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Richard D. Bernard is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Richard D. Bernard receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Richard D. Bernard in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



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March 28, 2025

This Brochure Supplement provides information about **Gary E. Clark, MS, CPM, CPPT** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Chas P. Smith is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Gary E. Clark, MS, CPM, CPPT, born September 18, 1945.

Gary has been affiliated with CPS Investment Advisors since February 2007.

He earned his B.S. in Mathematics in 1967 from Kansas State University and his Masters in Systems Analysis-Operations Research in 1969 from the Air Force Institute of Technology. He graduated from National Defense University in 1983.

He retired from the United States Air Force after 26 years of active duty. His grade at retirement was Colonel in the Regular Air Force.

Subsequent to his Air Force career he served as the Civil Service and Retirement Director for the City of Lakeland, Florida. He retired from this position in 2006 after 13.5 years of service.

Gary passed the Series 65 in 2008.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Gary E. Clark is not engaged in other investment-related business activities for compensation outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Gary E. Clark receives referral compensation for his advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Gary E. Clark in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



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March 28, 2025

This Brochure Supplement provides information about **Robert M. Eckenroth, CPA, MBA** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Peter C. Golotko is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Robert M. Eckenroth, CPA, MBA, born April 21, 1948.

Robert joined CPS Investment Advisors in July, 2015.

He earned his B.A in Accounting in 1970 from Grove City College and his Masters in Business Administration (MBA) in 1975 from the University of Maryland.

He became a Certified Public Accountant (CPA) in 1977, and had public accounting experience from 1975-1979 with Price Waterhouse and Company in Washington, DC. 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, minimum experience levels, 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 each year. 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, maintain client confidentiality, disclose to the client any commission or referral fees, and service the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

Robert retired as a Vice President from Marriott International after 30 years with the Company. He was the President of Barom Consulting, LLC for 2 years prior to joining CPS Investment Advisors.

Robert passed the Series 65 in 2016.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Robert M. Eckenroth is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Robert M. Eckenroth receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Robert M. Eckenroth in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



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March 28, 2025

This Brochure Supplement provides information about **Patrick E. Gauthier, CFP®** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Patrick E. Gauthier is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Patrick E. Gauthier, CFP®, born October 16, 1985

Patrick has been employed with Chas P. Smith & Associates, P.A., CPA's since August 2019. He is responsible for the daily oversight of the trading and investment research department. Previously, Patrick was a Financial Advisor with USAA. In that role, he assisted service members and their families with financial goals including retirement planning and risk management.

He earned his B.S. in Finance in 2007 from The University of South Florida. Patrick then earned a Master in Securities Analysis and Portfolio Management from Creighton University in 2014. In 2015 Patrick earned the CERTIFIED FINANCIAL PLANNER™ (CFP®) designation.

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Patrick passed the Series 66 and Series 7 in 2011 and attained the CFP® designation in 2015.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Patrick E. Gauthier is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Patrick E. Gauthier receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Patrick E. Gauthier in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



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March 28, 2025

This Brochure Supplement provides information about **Ryan P. Higgins** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Ryan P. Higgins is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Ryan P. Higgins, born June 5, 1986.

Ryan has been employed as a Financial Advisor by CPS Investment Advisors since July 2022. Prior to his employment with CPS Investment Advisors, Ryan worked from 2015-2020 for two separate broker-dealers, serving as a Financial Advisor for both investment firms.

He earned dual degrees from Florida State University in 2010 with a B.S. in Political Science and a B.S. in Social Science. Ryan obtained his Series 7 license in 2015, in addition to his 63 and 65 licenses in 2016.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Ryan P. Higgins is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Ryan P. Higgins receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Ryan P. Higgins in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



Supplement for Eric J. Jackson
eric@cpsinvest.com

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March 28, 2025

This Brochure Supplement provides information about **Eric J. Jackson** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Eric J. Jackson is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Eric J. Jackson, born October 26, 1981.

Eric has been employed as a Financial Advisor by CPS Investment Advisors since March 2021. Prior to his employment with CPS Investment Advisors, Eric worked from 2013-2021 for two separate broker-dealers, serving as a Financial Advisor for both investment firms.

He earned his B.S. in Agricultural Business Economics from the University of Florida in 2005. Eric obtained his Series 66 license in 2017.

Eric is a member of AICPA since 2020, with a focus on Personal Financial Planning. He is also a professional member of Kingdom Advisors.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Eric J. Jackson is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Eric J. Jackson receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Eric J. Jackson in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



Supplement for Tamara L. Jemison
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March 28, 2025

This Brochure Supplement provides information about **Tamara L. Jemison** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Tamara L. Jemison is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Tamara L. Jemison, born August 2, 1984.

Tamara joined the Retirement Plan Services Division at CPS Investment Advisors, November 2018.

She earned her B.A. in Mass Communications – in 2010 from the University of South Florida. Tamara obtained her Series 65 license as a Registered Investment Advisor Representative in 2015.

Tamara received her Insurance License from the Florida Department of Financial Services in 2015 for Life including Variable Annuities and Health.

Tamara worked for USAA from 2010 – 2018. She served in many roles ranging from Insurance to Financial Advisor. When leaving USAA in 2018 she had the title of Financial Advisor II

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Tamara L. Jemison is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Tamara L. Jemison receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Tamara L. Jemison in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



Supplement for Derek M. Oxford
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March 28, 2025

This Brochure Supplement provides information about **Derek M. Oxford, CFP®**, **AEP®** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Derek M. Oxford is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Derek M. Oxford, CFP®, AEP®, born August 13, 1982.

Derek has been an employee of Chas P. Smith & Associates, P.A., CPA's since July of 2008.

He earned his B.S. in Finance in 2004 from Florida State University.

He began his career in August, 2004 as a Financial Advisor after graduating from Florida State University. Having experience with the front office, he transitioned to the back-office setting with the Merrill Lynch Insurance Group as the liaison with the west coast division for the annuity whole-sales dept. There, he learned detailed information about insurance products. Derek later became an institutional trader with the Merrill Lynch WRAP program working directly with fund managers for large asset level money transfers.

In 2007, Derek transitioned to Fidelity Investments as a college planning specialist for the Southeast United States. In 2008, CPS Investment Advisors opened the doors to Derek, where he became a Portfolio Analyst and advisor. Since 2015, Derek's sole duties have been financial planning for clients including but not limited to financial analysis, investment strategies, estate planning, liability analysis, and retirement planning.

Derek passed the Series 66 in 2005, the Certified Financial Planner (CFP®) in 2015, and obtained the Accredited Estate Planner (AEP®) designation in 2020. The Certified Financial Planner (CFP) designation is a [professional certification](#) mark for [financial planners](#) conferred by the [Certified Financial Planner Board of Standards](#) (CFP Board) in the United States, and by 25 other organizations affiliated with Financial Planning Standards Board (FPSB). To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, and pay an ongoing certification fee.

The AEP® designation is a graduate level, multi-disciplinary specialization in estate planning, obtained in addition to already recognized professional credentials within the various disciplines of estate planning. It is awarded by the National Association of Estate Planners & Councils to recognize estate planning professionals who meet stringent requirements of experience, knowledge, education, professional reputation, and character. An AEP® designee must embrace the team concept of estate planning and adhere to the NAEPC Code of Ethics, as well as participate in an annual renewal and recertification process.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Derek M. Oxford is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Derek M. Oxford receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Derek M. Oxford in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



Supplement for Rachael Saviñon
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March 28, 2025

This Brochure Supplement provides information about **Rachael Saviñon**, that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Rachael Saviñon is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Rachael Saviñon, born May 21st, 1987

Rachael has been employed with Chas P. Smith & Associates, P.A., CPA's since April 2022. Her role as CPAlliance™ Assistant Director is to provide outstanding customer service to the members they serve. Previously, Rachael was a registered client associate with Wells Fargo Clearing Services, LLC.

She earned her B.S. in Human Services in 2009 from Southeastern University.

Rachael passed the Series 6 & 63 in 2017, the Series 7 in 2019 and the Series 65 in 2022.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Rachael Saviñon is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Rachael Saviñon receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Rachael Saviñon in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



Supplement for Sterling J Searcy Jr.
sterling@cpsinvest.com

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March 28, 2025

This Brochure Supplement provides information about **Sterling J Searcy Jr, CPA** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about Sterling J Searcy Jr. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Sterling J Searcy Jr, CPA, born April 13, 1989.

Sterling earned his Masters in Accountancy (MAcc) at Florida Southern College in 2016.

He became a Certified Public Accountant (CPA) in 2017. 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, minimum experience levels, 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 each year. 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, maintain client confidentiality, disclose to the client any commission or referral fees, and service the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

Sterling passed the Series 65 exam in 2017.

Sterling's recent business experience includes the following:

- Financial Advisor, CPS Group CPS's, PA, May 2018 – Present
- Owner, Searcy Tax LLC, December 2017- May 2018
- Accountant Supervisor, Kaba Consulting, November 2017 – December 2017
- International Tax Associate, JPC International Tax Advisors, February 2016- November 2017
- Senior Accountant, ArithmeTech Inc., September 2015- February 2016
- Accounting Manager, Pressure-Pro Inc., July 2012 – August 2015

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS' management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

Sterling J Searcy Jr. is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA's.

Item 5 – Additional Compensation

Sterling J Searcy Jr. receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with Sterling J Searcy Jr. in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com.



Supplement for Kelley “K.C.” Wilson
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March 28, 2025

This Brochure Supplement provides information about **Kelley “K.C.” Wilson** that supplements the CPS Investment Advisors Brochure. You should have received a copy of that Brochure. Please contact Peter C. Golotko, Chief Compliance Officer, if you did not receive CPS Investment Advisors Brochure or if you have any questions about the contents of this supplement.

Additional information about K.C. Wilson is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Kelley “K.C.” Wilson, CFP® born March 17, 1994.

K.C. has been an employee of Chas P. Smith & Associates, P.A., CPA’s since July 2016. Previously K.C. worked for Compass Flooring Distributor from 2012 through June 2016 as a Sales & Assistant Warehouse Manager.

He earned his B.S. in Accounting & Business Administration, from Florida Southern College in 2016.

In 2022 K.C. earned the CERTIFIED FINANCIAL PLANNER™ (CFP®) designation.

The CERTIFIED FINANCIAL PLANNER™ (CFP®) designation is a [professional certification](#) mark for [financial planners](#) conferred by the [Certified Financial Planner Board of Standards](#) (CFP® Board) in the United States, and by 25 other organizations affiliated with Financial Planning Standards Board (FPSB). To receive authorization to use the designation, the candidate must meet education, examination, experience, and ethics requirements, and pay an ongoing certification fee.

K.C. passed the Series 65 in 2018.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CPS or the integrity of CPS’ management. CPS has no information applicable to this item.

Item 4 – Other Business Activities

K.C. Wilson is not engaged in other investment-related business activities outside of Chas P. Smith & Associates, P.A., CPA’s.

Item 5 – Additional Compensation

K.C. Wilson receives no additional compensation for advisory services. The firm also has a strict gift and entertainment policy that is overseen by the Chief Compliance Officer.

Item 6 – Supervision

Peter C. Golotko, Chief Compliance Officer, meets regularly with K.C. Wilson in a supervisory role to monitor the advice provided to clients. Peter can be contacted at (863) 688-1725 or peter@cpsinvest.com

EFFECTIVE DATE: OCTOBER 2023

What does CPS Investment Advisors (CPS) do with your personal information?

WHY: Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

WHAT: The types of personal information we collect and share depends on the product or service you have with us. This information can include: Social Security number and identity information, address, telephone number, and e-mail. Securities accounts and account holdings, balances, family composition, and background. Securities transactions and investment objectives, net worth, income, and fee payment history.

HOW? All Financial companies need to share customer personal information to run their everyday business. In the chart to the right, we list the reasons financial companies can share their customer's personal information: the reasons CPS chooses to share; and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION.	DOES CPS SHARE?	CAN YOU LIMIT THIS SHARING?
For everyday business purposes Such as process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to the credit business	YES	NO
For our marketing purposes To offer our products and services to you.	YES	NO
For joint marketing with other financial companies	NO	N/A
For our affiliates' everyday business purposes Information about your transactions and experiences	YES	NO
For our affiliates' everyday business purposes Information about your creditworthiness	YES	YES
For our affiliates to market to you	YES	YES
For nonaffiliated to market to you	NO	N/A

TO LIMIT OUR SHARING | (863) 688-1725 | CPSINVEST.COM

If you are a new customer, we can begin sharing your information for 30 days from the date we sent you this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

PRIVACY POLICY | THE FACTS

CPSInvest.com

MAIL BELOW FORM TO:

CPS Investment Advisors | 205 East Orange Street #310 | Lakeland, FL 33801

PLEASE PRINT

NAME	ADDRESS	
CITY	STATE	ZIP

CHECK ANY/ALL YOU WANT TO LIMIT:

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- Do not allow your affiliates to use my personal information to market to me.

WHO IS PROVIDING THIS NOTICE?

CPS Investment Advisors (“CPS”)

HOW DOES CPS PROTECT MY PERSONAL INFORMATION?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. **We restrict access to your non-public personal information to those employees who need to know that information to service your account.**

HOW DOES CPS COLLECT MY PERSONAL INFORMATION?

We collect your personal information, for example, when;

- You sign an agreement or open a brokerage/custodial account.
- Communicate with us or purchase or sell securities.
- Deposit or withdraw funds, provide or update your investment portfolio.

WHY CAN'T I LIMIT ALL SHARING?

Federal law gives you the right to limit only;

- Sharing for affiliates’ everyday business purposes - information about your creditworthiness.
- Affiliates from using your information to market to you.
- Sharing for non-affiliates to market to you.

State laws and individual companies may give you additional rights to limit sharing.

WHAT HAPPENS WHEN I LIMIT SHARING FOR AN ACCOUNT I HOLD JOINTLY WITH SOMEONE ELSE?

Your choices will apply to everyone on your account.

DEFINITIONS	
AFFILIATES	Companies related by common ownership or control. They can be financial and nonfinancial companies. CPS Group CPAs, PA, a related accounting firm. CPAlliance™ Insurances Services, a related insurance agency. We only share your information with these affiliates.
NON-AFFILIATES	Companies not related by common ownership or control. They can be financial and nonfinancial companies. We will not share your information with any nonaffiliates unless such sharing is necessary to service your account or required by law.
JOINT MARKETING	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. We have not entered into any joint marketing agreements.

Effective Date: October 2023

CUSTOMER RELATIONSHIP SUMMARY	
<p>INTRODUCTION</p>	<p>CPS Investment Advisors (CPS) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about investment advisers and investing.</p>
<p>WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?</p>	<p>We offer investment advisory services to all retail investors directly and through our CPAlliance™ program, including Investment Supervisory Services, 401(k) services, 401(k) Pilot services, 403(b) Services, Personal Financial Counseling, Cash Management Services and Separately Managed Accounts (SMA). At the initial review of a client's portfolio, CPS may give advice on all investments owned by the client.</p> <p>CPS has discretionary authority (with respect to the purchase and sale of securities) and provides ongoing supervisory services for each account. Information gathered includes a client's current financial status, future goals and attitudes towards risk.</p> <p>CPS offers discretionary and non-discretionary management services to members of the CPAlliance™ SMA program. CPS offers separate account billing and reporting services only for the non-discretionary accounts. It is the responsibility of the participating CPAlliance™ member to monitor the trading and performance of the account.</p> <p>For additional information, please see our Form ADV Part 2, the Client Brochure, Items 4 and 7.</p> <p>Conversation Starters - Ask your financial professional:</p> <ul style="list-style-type: none"> • Given my financial situation, should I choose an investment advisory service? Why or why not? • How will you choose investments to recommend to me? • What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?
<p>WHAT FEES WILL I PAY?</p>	<p>Investment services fees are calculated on assets under management or a fixed fee basis. Fees for financial planning and consulting will be charged either on an hourly basis or fixed fee basis. CPS may waive the financial planning and consulting fee for those clients who select CPS Investment Advisors for investment advisory services.</p> <p>CPS will generally bill its fees in advance on a quarterly basis. Clients may also elect to be billed directly for fees or to authorize CPS to directly debit fees from client accounts. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.</p>

<p>WHAT FEES WILL I PAY? (CONT.)</p>	<p>CPS fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client.</p> <p>You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.</p> <p>For additional information, please see our Form ADV Part 2, the Client Brochure, Items 5 and 12.</p> <p>Conversation Starters - Ask your financial professional:</p> <ul style="list-style-type: none"> • Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?
<p>WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?</p>	<p>When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they affect the recommendations we provide you. Here are some examples to help you understand what this means.</p> <p>Other than the investment advisory services and Personal Financial Counseling, CPS does accept outside sponsorships for its annual CPAlliance™ Roundtable and community events. Most recent sponsors have included Fidelity Investments.</p> <p>CPS offers a two-day training seminar for CPAlliance™ members to learn how to add money management to their financial planning services. The cost of the training is \$2,500. This is a deposit which will be returned to the CPAlliance™ member upon reaching \$10 million in assets under management.</p> <p>Conversation Starters - Ask your financial professional:</p> <ul style="list-style-type: none"> • How might your conflicts of interest affect me, and how will you address them? <p>For additional information, please see our Form ADV Part 2, the Client Brochure, Item 4.</p>
<p>HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?</p>	<p>CPS financial professionals are paid on a salary plus bonus basis related to the firm income from clients they are responsible for servicing.</p>
<p>DO ANY OF YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?</p>	<p>CPS does not have any financial professionals who have a legal or disciplinary history.</p> <p>For additional information, please visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.</p> <p>Conversation Starters - Ask your financial professional:</p> <ul style="list-style-type: none"> • As a financial professional, do you have any disciplinary history? • For what type of conduct?
<p>ADDITIONAL INFORMATION</p>	<p>For additional information about our services. If you would like additional, up-to-date information or a copy of this disclosure, please contact Esther Barnette at 863-688-1725 ext.102 or by email at esther@cpsinvest.com.</p> <p>Conversation Starters - Ask your financial professional:</p> <ul style="list-style-type: none"> • Who is my primary contact person? Is he or she a representative of an investment-adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?