

Form ADV: Part 2 Brochure

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March 30, 2011

This brochure provides information about the qualifications and business practices of Comprehensive Wealth Services. If you have any questions about this brochure, please contact us at the telephone number or email address above. The information in this brochure has not been approved or verified by the Securities and Exchange Commission (SEC) or any state securities authority. Additional information about our firm can be found on the SEC's website at www.adviserinfo.sec.gov. Our firm is a Registered Investment Adviser. We are required to inform you that registration itself does not imply a certain level of skill or training.

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About the Firm

Comprehensive Wealth Services LLC (CWS) was formed in 2004 and became a Registered Investment Advisor in 2008. Jeremy Klopper is the sole owner and principal of the firm.

Our investment advisor services are delivered primarily through the use of mutual funds. Our advisory services are tailored to our clients' risk tolerance, tax situation, and other personal considerations. Clients can impose restrictions on investing in certain types of securities.

Fees & Compensation

We are a fee only firm. We receive fees only from our clients and do not accept any third party compensation, commissions, or referral fees.

Our services may include investment advisory services, tax services, and general financial planning services. We generally charge an hourly fee, fixed annual fee, or asset based fee. In addition to our fees, our clients will pay money manager fees, mutual fund expense fees, or other fees necessary to implement the advice we provide. We do not receive any portion of those fees.

Performance-Based Fees and Side-by-Side Management

We do not accept performance-based fees based upon a percentage of the capital appreciation of assets. The owner of CWS also invests personal money in the same programs as our clients, with the same pricing our clients receive.

Types of Clients

We generally serve individuals and their related entities: trusts, partnerships, and foundations. The majority of our clients are either current or retired corporate executives, but we serve other high net worth individuals as well. We do not impose minimum asset or fee levels.

Method of Analysis, Strategies, and Risk of Loss

CWS recommends traditional investment strategies for clients. We first start by helping clients determine an asset allocation investment strategy with which they are comfortable. Once the strategy is formulated, we then implement using money managers, mutual funds and ETFs. We monitor performance of the various managers and funds with our clients. We generally believe that the higher costs associated with

active managers should be avoided. We also feel that there is strong evidence that suggests it is difficult and rare for an active manager to add value to a portfolio.

Disciplinary Information

None of the principals/key employees of CWS have ever been subject to any legal or disciplinary actions or controversies.

Other Financial Industry Activities and Affiliations

None of the principals/key employees of CWS have outside relationships and affiliations that would create a material conflict of interest with our clients. We are only paid by our clients. However, we routinely make referrals to other professionals such as attorneys, mortgage bankers and insurance agents that we believe would provide good service to our clients. Our relationships with these professionals are always predicated on what we believe is best for the client.

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

We have a comprehensive Code of Ethics that we will provide to any client or prospective client upon request. The basic principal is that we are fiduciaries for our clients and are required to put their interests ahead of our own in advising them. We do not recommend or purchase for client accounts securities in which we have a financial interest. We sometimes invest with the same money managers and mutual funds as our clients. We invest on the same terms and we are subject to the same pricing as our clients.

Brokerage Practices

In considering broker dealers, we consider several factors: pricing and execution for the clients, and the ease of doing business with that broker, both for CWS and the client. Since we receive no compensation from any non-client party, compensation from a broker is not a consideration. We receive no "soft dollar" benefits, including proprietary research. We do not receive client referrals from any broker dealer or third party financial institution. Clients are free to choose any broker dealer. If a client wishes to use CWS to assist in the actual investment implementation, we will use Charles Schwab or SEI.

Review of Accounts

Jeremy Klopper formally reviews client accounts at least quarterly. As a practical matter, client accounts are reviewed on an informal basis at least weekly. Account reviews are also triggered by unexpected changes in the market or changing client circumstances. Clients receive quarterly performance reports and receive monthly account statements directly from the custodian, either by mail or electronically. Many of our clients have

chosen to have direct access online to their accounts through the custodian's web portal.

Custody

We do not hold custody of client assets. We believe this is a best practice in terms of client protection. We do not offer check writing services. All client assets under our care are held at reputable, third-party custodians. Each client receives statements either electronically or by US mail directly from the custodian.

Investment Discretion

CWS has discretionary authority and will invest client assets in a manner consistent with the analysis and discussions that occurred throughout the planning process. A Investment Policy Statement is signed by the client and kept on file by the advisor so that there is always a clear understanding of the investment objective and expectations of the client.

Voting Client Securities

We do not vote client securities. Clients can choose to receive proxies and other solicitations directly from the custodian; in our experience, most choose not to receive this information.

Financial Information

We do not require or solicit prepayment of fees more than 6 months in advance; therefore, we are not required to submit a balance sheet.

Background Information for Jeremy Klopper

Born: 1971

Education: MBA Finance Fairleigh Dickinson University
BA Economics Moravian College

Recent Work History

2004-Present: Comprehensive Wealth Services LLC

1999-2004: PricewaterhouseCoopers LLP

1997-1999: The Ayco Company LP

Professional Credentials

Certified Financial Planner ®

IRS Enrolled Agent