

## Comprehensive Capital Management, Inc. – Form CRS

Comprehensive Capital Management, Inc. (“we”, “our” or “us”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. As described in its Form CRS, our affiliate, APW Capital, Inc. is registered with the SEC as a broker-dealer and is a member of FINRA and SIPC. Our services and compensation structure differs from that of a registered broker-dealer. Free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS). The site also provides educational materials about broker-dealers, investment advisers and investing. Information in text boxes below are intended to be conversation starters for you to have with us and are required by the instructions to Form CRS.

### *What investment services and advice can you provide me?*

We offer a variety of advisory services to retail investors, which include financial planning, consulting, and investment management services to individuals and their trusts and estates. We enable our financial professionals to provide customized advice to their clients. These professionals are permitted great latitude in selecting investments, investment strategies and delivering investment advice to you. Our financial professionals are able to provide ongoing management over your account through one or more of our management programs, which are described in Item 4 of our [Form ADV Part 2A](#).

When we agree to manage your assets, we consult with you on an initial and ongoing basis to assess your specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of your assets.

We typically manage accounts on a discretionary basis, which means we have the authority to buy and sell investments in your account without speaking to you prior to doing so. You can place reasonable restrictions on the securities that we buy by notifying us, in writing.

We do not limit the scope of the universe of securities that we use in managing accounts, and generally use equity securities, mutual funds and exchange traded funds (ETFs) although we may use or recommend other types of securities.

We do not typically have a minimum asset level for our retail investors, although your financial professional may impose their own minimums.

For more detailed information about our Advisory Business and the Types of Clients we generally service, please See Items 4 and 7, respectively in our [Form ADV Part 2A](#).

<i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i>
<i>How will you choose investments to recommend to me?</i>
<i>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i>

### *What fees will I pay?*

Most typically, our investment advisory fee is based on the value of the assets placed under our management and ranges from 0.50% to 2.95% as determined between you and your financial professional. In certain instances, we may agree to fixed or hourly fees. We typically deduct our fee from one or more of your investment accounts on a monthly or quarterly basis. Because we generally base our on the amount of your assets under our management, the more assets you entrust us to manage, the more you will pay us for our services. Therefore, we have an incentive to encourage you to increase the amount of assets that you entrust to us and our financial professionals have an incentive to take added risk in managing your account.

Your account will be held with a qualified custodian. Your assets may be invested in investment companies, such as mutual funds and ETFs. You will bear your pro rata share of the investment management fees and other fees of these funds, which are in addition to the fees you pay us. These fees and expenses are described in each fund’s prospectus and potentially include a management fee and other fund expenses. 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. For financial planning and consulting relationships, we generally agree to fixed or hourly fees, which are negotiable and determined by our financial professionals. Please make sure you understand what fees and costs you are paying.

*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?*

For more detailed information about our fees and costs related to our management of your account, please See Item 5 in our [Form ADV Part 2A](#).

***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?***

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 can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- \* We may recommend a particular custodian from whom we receive support services. This presents a conflict of interest, because our receipt of their support make us more inclined to continue using and recommending them.
- \* We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee. If we do not currently manage your account held with your employer's plan, this will increase our compensation.
- \* We may recommend that you open your account through an introducing relationship with APW Capital, Inc. where Pershing, LLC acts as clearing broker-dealer. This creates a conflict of interest, because it allows our APW Capital to earn additional compensation that it would not otherwise earn if you held your account at an unaffiliated custodian.
- \* We and our financial professionals have affiliations with (i) Aurora Insurance Services, Inc., an insurance agency, and (ii) APW Capital, Inc. a broker-dealer. Certain financial professionals are licensed insurance agents individually or through other insurance agencies. These relationships present a conflict of interest, because our affiliates and our financial professionals stand to receive additional compensation if you purchase a product or service from them. You are free to use the services of any non-affiliated entity or person. When our employees recommend that you purchase a securities or insurance product from any of our affiliates, they are held to a different standard of care. You should review APW Capital, Inc.'s Form CRS, your customer agreement, and other disclosures to fully understand that arrangement.

*How might your conflicts of interest affect me, and how will you address them?*

For more detailed information about these and other conflicts of interest, please review Item 4, 11 and 12 of our [Form ADV Part 2A](#).

***How do your financial professionals make money?***

Our financial professionals are compensated based on a percentage of the fees earned on accounts that they service (up to 100%). You should discuss your financial professional's compensation directly with your financial professional.

***Do you or your financial professionals have legal or disciplinary history? Yes***

We encourage you to visit [www.Investor.gov/CRS](http://www.Investor.gov/CRS) to research our firm and our financial professionals.

*As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

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Additional information about our firm is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may contact our Chief Compliance Officer at any time to request a current copy of your Form ADV Part 2A or our *relationship summary*. Our Chief Compliance Officer may be reached by phone at 973-394-0404.

*Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*