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Asset Management • Retirement, Tax and Estate Planning • Fee Only • No Commissions • Independent Advisor

Firm Brochure (Part 2A of Form ADV)

COMPREHENSIVE FINANCIAL PLANNING, LLC

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Durango, Colorado 81301

970-764-0953

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January 10, 2019

This brochure provides information about the qualifications and business practices of COMPREHENSIVE FINANCIAL PLANNING, LLC. If you have any questions about the contents of this brochure, please contact us at: 970-764-0953, or by email at Stan@CompFinancial.com. 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. Registration as a “Registered Investment Advisor” does not imply a certain level of skill or training. Additional information about COMPREHENSIVE FINANCIAL PLANNING, LLC is available on the SEC’s website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Comprehensive Financial Planning, LLC is 128461.

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The following material changes have been made since our last annual updating amendment on January 24, 2018.

Cover page: Business changed from S-corp to LLC. Phone number changed.

Page 1: Firm changed to LLC.

Page 3: Assets under Management have been updated.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 970-764-0953 or by email at Stan@CompFinancial.com.

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Advisory Business

Firm Description

Comprehensive Financial Planning provides the following services:

1. Financial planning including evaluation of current financial condition, retirement planning, tax planning and evaluating insurance and estate planning needs
2. Investment management for individuals and company retirement plans

Our mission is to partner with clients to establish and achieve the client's financial goals through objective planning and management of investment assets. Our purpose is to help our clients achieve financial independence by building and preserving their wealth. Our clients include individuals, small business owners, retirement plans, trusts and non-profits.

Comprehensive Financial Planning is a fee-only, independent firm. We agree to restrict our compensation solely and exclusively to the professional fees we receive directly from our clients. We do not accept any sales commissions, referral fees or other forms of compensation from any third parties. We are also an independent firm that has no financial relationship with any brokerage, insurance or mutual fund company.

We also have a fiduciary relationship with all our clients, meaning we are required to act in your best interests at all times.

Before any agreement for performing services is executed a copy of this Part 2A-ADV form is provided to the client. The client is also sent a client preliminary questionnaire to assist in defining the scope of services and assuring the services provided are beneficial and appropriate for the client.

All information furnished by the client to Comprehensive Financial Planning shall be treated with the strictest confidence. We will not voluntarily disclose confidential information to 3rd parties without clients' prior consent unless required by law, court order or agency directive.

The company was incorporated in the state of Colorado as an S Corporation on October 16, 2003. On March 31, 2018 the firm was converted from an S Corporation too an LLC under Colorado law. The firm is a single member LLC with Stan Johnson as the 100% member. The firm is located in Durango, Colorado. Approximately 15% of our business revenue is financial planning and 85% is investment management. Our investment management revenue includes ongoing financial planning services for our investment management clients.

Types of Advisory Services

Financial Planning

Our financial planning services are tailored to the client's specific needs. All the services shown below can be provided either in a comprehensive financial plan or to address specific issues not comprehensive in nature.

1. Evaluate current financial condition. Produce balance sheet showing current assets and liabilities and generate a cash flow statement. Furnish recommendations on debt management, establishment of emergency fund, need for family budgeting and ideas for managing expenses.
2. Review investment portfolio. We analyze a client's current investments to ensure they are appropriate for the client's financial condition, risk tolerance and goals. Recommendations for changes will be presented.
3. Analyze retirement plan. Based on the client's goals, determine if current savings will be adequate to fund their retirement. If funds are not adequate, develop a savings plan to help them achieve their goals.
4. Assist small businesses establish and manage retirement plans. Plans offered include 401(k), 403(b), defined benefit pension plans and others.
5. Provide strategies for reducing and deferring income and other taxes.
6. Develop plan to reduce the cost of sending the kids or grandkids to college and establish savings plan to fund.
7. Review current insurance coverage and present ideas for improvement.
8. Ensure wills, trusts, power of attorney, asset titles and other estate documents are in place. Consult with client attorney to produce action plan to ensure your end of life goals are achieved.

Before the planning process starts the client will be required to fill out a Confidential Personal Financial Profile form detailing all pertinent client information. This information will form the basis for any recommendations made to the client.

In performing the above services, other professionals that serve the client will be consulted such as accountants, lawyers and insurance agents.

Investment Management Services

Portfolios fall all over the risk/reward spectrum. We'll work with the client to find the right mix of risk and reward. We measure the client's portfolio performance and compare it to a benchmark consisting of several indexes. We combine the performance of client accounts into one comprehensive statement.

Our investment advisory services are performed with Comprehensive Financial Planning having discretionary authority over the client's portfolio. All assets will be

held with an independent 3rd party custodian in one or more accounts. Comprehensive Financial Planning has no custody of client's assets, only trading authority. Our assets under management as of January 10, 2019 were approximately \$18,524,600.

We provide the client the benefit of our continuing study of economic conditions, securities markets and independent analysis of financial assets. After reviewing the Confidential Personal Financial Profile that the client fills out, we work with the client to produce an Investment Policy Statement (IPS) that documents the following information:

- Target returns expressed in percent or relative to a given index
- Risk tolerance and expected portfolio volatility and loss threshold
- Liquidity requirements (cash for emergency fund or specific need)
- Time horizon (short, intermediate or long-term)
- Asset Allocation that specifies the range of weightings of major asset classes
- Laws and regulations (mostly just for retirement plans)
- Tax considerations (income, capital gains, estate)
- Unique client preferences and circumstances such as restrictions on investing in certain securities or types of securities.

We use actively managed and passive no-load index funds and exchange traded funds (ETFs). The types of investments we use include:

- Stock funds (domestic and foreign)
- Bond funds (corporate, government, mortgage-backed, high and low yield, domestic and foreign)
- Money-market funds
- Real estate investment trusts (REITS)
- Commodity funds
- Bear, long-short and other alternative strategy funds

Emphasis is placed upon building a diversified portfolio that lowers volatility without sacrificing returns. We incorporate this risk reduction strategy by investing in multiple fund styles and asset classes that don't always increase and decrease in value at the same time (low correlations). We also look for opportunities to overweight and

underweight asset classes when we see long-term fundamental valuations that present compelling reasons to do so.

Fees and Compensation

Description

Comprehensive Financial Planning is a fee-only firm. Whenever we recommend that the client own a specific financial product or use the services of a specific custodian we will not accept any sales commissions, referral fees, trail fees, prizes or other forms of compensation from any third parties. Gifts, meals or vacation trips received from product vendors or custodians in excess of \$100 shall not be accepted. This commitment to our clients will minimize any conflicts of interest we may have in dealing with product vendors, custodians and other professionals.

The Adviser offers two categories of service for clients: financial planning only and investment management. Clients who wish to use our investment management services are required to utilize our financial planning services by at least installing a Basic financial plan. Fees for financial planning and investment management are separate and distinct. The following paragraphs describes the fees for each service. The client agreement will define the fees to be charged.

Financial Planning Fees

All fees are established with the client before work begins and are always negotiable. Fees are either hourly or fixed fee. If the scope of work can be determined with accuracy before the work begins, a fixed fee will be negotiated with the client based on the scope as defined in the written agreement with the client. The following provides an idea of the approximate range of fees we charge for the most common types of plans.

Basic Plan Balance Sheet/Cash Flow/Retirement Projection/Investment Review: \$1,500-\$2,400

Standard Plan Basic + Insurance Review + Basic Estate Planning: \$2,400-\$3,500.

Advanced Plan Standard + Advanced Estate Planning/Business Evaluations/Special Situations: \$3,500-\$5,000.

We can also work under an hourly rate of \$200 per hour. Before the work begins an estimate of the hours required to perform the service will be provided to the client and included in the client agreement.

Before hourly or fixed fee work begins a 50% deposit will be required under any of the fee structures above. The deposit is due upon signing of the agreement and the final payment is due upon completion of the work. If the agreement is terminated in writing by the client before the work is complete, a refund of a portion of the deposit may be available based upon the prorated fee due.

Investment Management Fees

The client is charged a management fee based on a percent of assets under management, billed quarterly, in advance. The fee is based on the market value of the assets under management on the last business day of the previous quarter as follows:

Assets Under Management	Annual Fee-%	Quarterly Fee-%
On the first \$400,000	1.0	0.25
On the next \$400,000	0.8	0.20
On the next \$400,000	0.6	0.15
On all over \$1,200,000	0.4	0.10
Conservative Portfolios (see note below)	0.7	0.175

Note: Conservative Portfolios are those with 60% or more fixed income.

Negotiated Rate _____ (initials)

There is no minimum account size required but there is a minimum quarterly fee of \$800. The minimum fee can be excessive for assets under management less than \$200,000. The management fee will be prorated for the initial quarter. Fees are negotiable for special situations. Client fees are deducted directly from their investment accounts unless otherwise directed by the client. (See Custody section for additional information regarding deduction of fees.) The investment management fee will be pro-rated for the quarter in which the cancellation notice was given, based on the number of days remaining in the quarter.

After the client's initial financial plan is in place (see Section 2 in Financial Planning Section above for the fee to do so) the client will receive a credit against ongoing financial planning fees of one hour per year per \$200,000 of assets under management.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.80 means that the mutual fund company charges 0.8% for their services. These fees are in addition to the fees paid by you to Comprehensive Financial Planning, LLC.

Conflicts of Interest

While Comprehensive Financial Planning works hard to eliminate any conflicts of interest with our clients, some still exist. As a financial planner and an investment

advisor we are compensated for advising clients on matters that affect all aspects of their financial life, as well as for their assets under our management. For example, we might be tempted to encourage a client to sell personal assets or take out a home equity loan to increase the amount of assets under our management. We also may be tempted to recommend investments that are riskier than required to meet the client's target returns in an effort to increase the size of funds under management. To address this we pledge to keep our clients informed about these conflicts and keep the client's interests above all others and to adhere to the Client's written investment policy statement and our Fiduciary Oath which presents the clients' informed decisions about the tradeoffs between risk and return.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Comprehensive Financial Planning, LLC does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

We offer our services to individuals, small business owners, retirement plans, trusts and non-profits. Our clients come from a wide variety of backgrounds, family status and financial situations but most have a few common traits:

Most are baby boomers, professionals, business owners and young retirees looking to build and protect their retirement nest egg.

They are good savers.

They may be millionaires, but they don't act like it.

We believe the flexibility of our service offering and fee structure enables moderate, as well as high wealth individuals to utilize our services. While we have no firm portfolio minimum value for our investment management services, clients with less than \$300,000 to manage are encouraged to use our investment advice as part of a financial planning fee arrangement.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis and Investment Strategy

The primary steps in our investment advisory process are:

- A. Establish realistic goals and assumptions with the client, making sure the client understands the trade-offs of risk and reward
- B. Develop an asset allocation strategy that will establish approximate composition of asset classes in the portfolio (stocks, bonds, cash, commodities, etc.)
- C. Select mutual funds and other securities using our analysis of the funds, the markets and economic conditions
- D. Continually monitor the portfolios and make changes as fundamentals in the market or fund specific issues occur
- E. Issue a portfolio report quarterly to the client showing portfolio returns and compare those returns to a benchmark consisting of several market indexes
- F. Review the asset allocation at least annually with the client, making sure any changes in the client situation are incorporated into the plan

The asset allocation is developed using the target returns established by the client, the clients' time horizon and his tolerance for risk. Mathematical models are used to project the range of portfolio returns and volatility that may occur. We then use a heavy dose of judgment and, working with the client, set an asset allocation percentage range for each major asset class. The major asset classes include Large Cap, Small Cap, and International Equities, fixed income of all types, cash, commodities, alternatives and real assets. The portfolio is rebalanced when required to keep the actual portfolio allocation within the ranges as set by the IPS.

We use actively managed and passive index funds and ETFs. We believe in investing with a number of funds with different styles (growth, value, growth at a reasonable price) and only over or underweighting one style over another when there is clear value. Our focus is on the long term fund performance and the fund management team in place. We utilize two 3rd party research providers that provide market, economic and mutual fund data and evaluations.

Managing risk is a top priority at Comprehensive Financial Planning. All investments are subject to risk from events outside anyone's control. We control risk by using several techniques. First, we use mutual funds and other publicly traded securities as opposed to individual securities. Second, we use effective diversification using the asset allocation strategies as described above. When picking individual funds we build a portfolio that includes an allocation of funds that don't always move with the rest of the market. These funds with low correlations to the market will reduce the portfolio volatility.

When the economic and market conditions warrant we may use cash, bear or long-short mutual funds and other alternatives in a portion of our portfolios in an effort to reduce volatility and reduce the chances of violating our loss thresholds.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Not applicable.

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

Participation or Interest in Client Transactions

The principal of Comprehensive Financial Planning, Stan Johnson will often trade in the same securities that are being traded for our clients. Quite often orders will be executed across many client portfolios and our personal portfolios at the same time. We believe in eating our own cooking. Note that Comprehensive Financial Planning has a potential conflict of interest here since the client and Comprehensive Financial Planning may be selling or buying the same asset at the same time. Since all of the securities held in our portfolios are in mutual funds or exchange traded funds that are widely held, we consider the impact on the markets of these trades to be close to, if not zero. Any orders where multiple client and our personal accounts are aggregated will be done so in compliance with the appropriate SEC requirements. Stan will not trade his own securities ahead of client trades per the provisions of the Comprehensive Financial Planning, Inc. *Compliance Manual*.

Records of all client trades and our personal trades will be maintained in accordance with the requirements of the Investment Advisers Act of 1940.

Brokerage Practices

Selecting Brokerage Firms

Unless it is agreed to otherwise, the client shall be required to maintain all investments under management with TD Ameritrade Inc. The client shall enter into a formal agreement with Comprehensive Financial Planning and a separate custodial/clearing agreement with TD Ameritrade. Client will sign appropriate "Limited Powers of Attorney" or "Trading Authorizations" required by the custodian. Both agreements will authorize the custodian to debit the account for the amount of the Comprehensive Financial Planning investment management fee and to directly remit that fee to Comprehensive Financial Planning in accordance with applicable regulatory procedures.

Factors which we considered in choosing TD Ameritrade includes financial strength, reputation, execution, pricing and service. We believe, although we cannot guarantee in all cases, that TD Ameritrade has the best combination of service and cost effectiveness for our clients. Their commissions and fees are lower than most other custodian/brokers. They have a network of over 2,200 mutual funds and 200 exchange traded funds where no transaction fees will apply to purchase or sales. They also have access to institutional class shares that carry lower management fees than retail class shares. All accounts can be viewed 24/7 on their web site. They do not provide any significant research as part of their service which fits our business model since we use our own research and independent research purchased from independent sources.

Not all investment managers direct their clients to execute transactions through a specified broker-dealer. By directing the client to do so may present some conflicts of interest. This could be due to compensation that is sometimes given to advisors for moving funds to a custodian. Our fee-only pledge to our clients prevents Comprehensive Financial Planning from receiving any form of compensation from the custodian or anyone other than our clients. If there are any referral fees, commission recaptures or other forms of rebates available due to the investments with the custodian, any funds recaptured will be distributed to the client.

Comprehensive Financial Planning, Inc. does not receive fees or commissions from any of these arrangements.

Best Execution

Comprehensive Financial Planning, LLC reviews the execution of trades once a year at each custodian. The review is documented in the Comprehensive Financial Planning, LLC *Compliance Manual*.

Order Aggregation

Almost all trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Under the investment management services the portfolios are monitored on an ongoing basis. At the least, monthly reviews are done evaluating rates of return and risk. Written quarterly reports are issued to the client and quarterly reviews in the office or over the phone are offered at no additional charge to the client.

The client is required to keep Comprehensive Financial Planning informed of any changes to the client's financial situation that may impact the suitability of the investment policy. Annually the client will be sent his client questionnaire to update all information and the investment policy statement will be updated if required. All portfolios are reviewed by Stan Johnson.

Reviews for financial planning services are recommended annually and done at the client's request.

Client Referrals and Other Compensation

Incoming Referrals

Comprehensive Financial Planning, Inc. has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Comprehensive Financial Planning, Inc. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

None.

Custody

Custody

Comprehensive Financial Planning, LLC does not take physical possession of client assets. However, as fees are directly deducted from the client accounts, Comprehensive Financial Planning, LLC provides the safeguards required by the Rules under the Colorado Securities Act and therefore is not deemed to have custody.

- An invoice is sent to the client;
- The custodian provides statements at least quarterly to the client showing all disbursements for the custodian account, including advisory fees; and
- The client provides written authorization permitting the fees to be paid directly from the accounts maintained with the custodian.

Account Statements and Performance Reports

Clients are urged to compare the account statements received directly from their custodian (TD Ameritrade) to the quarterly performance report statements provided by Comprehensive Financial Planning, LLC.

Investment Discretion

Discretionary Authority for Trading

Comprehensive Financial Planning LLC accepts discretionary authority to manage securities accounts on behalf of clients. Comprehensive Financial Planning, Inc. has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have

approved in writing. Details on how this is implemented are discussed in the Investment Management Services section of this form.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney on the account application forms so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

Comprehensive Financial Planning does not vote client proxies Client shall be responsible for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the Assets. The Custodian/Broker will forward copies of all proxies and shareholder communications relating to the securities in the Account to the Client. Clients are always encouraged to contact Stan Johnson concerning questions about a particular proxy solicitation.

Financial Information

Financial Condition

Comprehensive Financial Planning, LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Comprehensive Financial Planning, LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$500 per client, and six months or more in advance.

Requirements for State-Registered Advisers

Please refer to ADV Part 2B for information relative to this section.

Privacy Statement

Comprehensive Financial Planning, LLC. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, your health, information about transactions between you and third parties, and information from consumer reporting agencies,

e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. All your nonpublic information is secured on our computer system. We employ a software firewall barrier and use secure data encryption techniques in our computer environment. We also restrict access to our computer system using a dual secure login procedure.

We do not provide your personal information to mailing list vendors or solicitors.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company and your personal records as permitted by law. Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter for records that are required to be maintained by federal and state securities laws. After that time, information may be destroyed.



**Brochure Supplement
(Part 2B of Form ADV)**

Stan Johnson

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January 1, 2019

This brochure supplement provides information about Stan Johnson that supplements the COMPREHENSIVE FINANCIAL PLANNING, LLC brochure. You should have received a copy of that brochure. Please contact us at: 970-764-0953, or by email at Stan@CompFinancial.com. If you did not receive the COMPREHENSIVE FINANCIAL PLANNING, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Stan Johnson is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Stan Johnson is 128461.

Education and Business Background

Stan Johnson-Principal

Born 1951

CERTIFIED FINANCIAL PLANNER certificant to 2006 thru 2018.

Uniform Investment Adviser Law Examination (Series 65) passed in 2003.

College for Financial Planning Certified Financial Planner Professional Education Program completed in 2002– Denver, Colorado.

University of Tulsa - Tulsa, Oklahoma – B.S. Chemical Engineering – 1973.

Recent Business Background and Affiliations

Comprehensive Financial Planning, LLC- Durango, Colorado- Principal

Member of the National Association of Personal Financial Advisors (NAPFA)

Member of Durango 9R Finance Advisory Committee

Animas High School Board member and Treasurer

Member and Treasurer of Durango Business Association

Lecturer, San Juan Community College in Farmington, New Mexico

San Juan Gas Processing, Inc. – Durango, Colorado- President and owner of engineering consulting company – 2000 to 2002.

Disciplinary Information

Stan Johnson has no disciplinary information to report.

Other Business Activities

Stan Johnson has no information to report other than that information disclosed above under Education and Business Background.

Additional Compensation

Stan Johnson only receives additional compensation as a result of his work at Comprehensive Financial Planning, LLC.

Supervision

As a sole practitioner, Stan is his own supervisor.

Requirements for State-Registered Advisers

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None