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**April 22, 2015**

**FORM ADV PART 2A. BROCHURE**

**This brochure provides information about the qualifications and business practices of Financial Compass Corporation. If you have any questions about the contents of this brochure, please contact us at 952-921-2121. 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.**

**Additional information about Financial Compass Corporation is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Financial Compass Corporation is 134754.**

**Financial Compass Corporation is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

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## *Advisory Business*

Form ADV Part 2A, Item 4

Financial Compass Corporation's registration was granted by the state of Minnesota on May 13, 2005, by the state of Florida on January 26, 2006 and by the state of Colorado on May 31, 2006. Robert Stai Davis (CRD Number 2982973) is President and Director of the firm. Mr. Davis owns one hundred (100%) percent of the equity of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries who have any ownership interest in the firm. The firm manages each client's portfolio on an individualized basis. Clients may impose restrictions on their accounts. The firm does not participate in wrap programs. As of April 21, 2015, the firm managed assets on a discretionary basis in the amount of \$7,759,210, representing 116 accounts and on a nondiscretionary basis in the amount of \$1,658,489 representing 10 accounts.

Investment Supervisory Services Financial Compass Corporation ("FCC") 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 its Managed Account Program. The firm may charge clients management fees for variable annuities, Section 529 plans and retirement plans such as 401(k) plans or 403(b) plans, or accounts held at other institutions from existing taxable, tax-deferred, or tax-free accounts and/or directly bill the client.

In the Managed Account Program ("MAP" or "Account") FCC assists clients in developing a personalized investment portfolio. FCC will obtain the necessary financial data from the client and assist the client in determining the suitability of the MAP Account and setting the appropriate investment objectives. For each MAP Account, the client will authorize FCC to purchase and sell no-load and load-waived mutual funds and variable annuity sub-account allocations on a limited discretionary basis and to liquidate previously purchased load funds as directed by the client pursuant to the investment objectives chosen by the client. Transactions in other securities approved by FCC for investment in this type of account may be effected in the client's account at the client's direction.

The client will have the opportunity to meet with FCC periodically to review the investments in the MAP Account. FCC shall assume all investment duties with respect to assets held in the MAP Account and shall have sole investment authority with respect to such assets. The client will be responsible for any and all tax consequences resulting from any client- or FCC- initiated reallocation of the Account. FCC may take any action or non-action as it deems appropriate, with or without consent or authority from the client and may exercise its discretion and invest such assets exactly as fully and freely as the client might do as owner, except that FCC is not authorized to withdraw any monies or securities from the Account. FCC shall further be free to make investment changes regardless of the resulting rate of portfolio turnover when it, in its sole discretion, shall determine that such changes will promote the investment objectives of the account. The client will designate the investment objective of the MAP Account on the New Account Form. Any changes to the investment objective will be provided to FCC in writing.

The client shall at all times maintain full and complete ownership rights (i.e., the right to add or withdraw securities or cash, pledge securities, and/or receive timely confirmations) to all assets held in his/her MAP Account. MAP Account assets will at no time be "pooled for investment" by FCC. FCC does not vote proxies for any of the assets in the client's account(s). The MAP Account is available for individual, corporate and pension accounts. The minimum asset level required to participate in the MAP Account is normally one hundred thousand dollars (\$100,000.00). The minimum for subsequent investments is normally one thousand dollars (\$1,000). However, at its discretion, FCC may open MAP Accounts with less.

Investment Advice Through Consultations

## Financial Advisory Service

Financial advice is an on-going process that should last a lifetime. FCC provides financial advisory service through its Personal Financial Advisor Plan (PFAP) on a fee basis. Typically, FCC evaluates various areas to develop advice tailored to fit the needs of the individual client. These areas may include (but not be limited to) assets and liabilities, current income, risk management and insurance coverage, retirement planning, estate planning, business holdings, committed and discretionary expenses, portfolio analysis and the client's investment attitudes and philosophy. FCC's advice may only focus on specific areas of concern to the client.

FCC may provide the client with recommendations on how to pursue an investment strategy consistent with the client's financial goals and objectives. The advice may consider issues such as the effects of inflation on savings, tax effects on income and investments, tax-sheltered investments, appropriate levels of cash reserves for contingencies and other relevant issues.

Implementing the recommendations may require the client to work closely with his/her attorney, accountant, insurance agent and investment advisor/broker. Implementation is entirely at the client's discretion. Product recommendation made by FCC on behalf of financial advisory clients may be limited to custodians and/or insurance firms selected by associated persons of FCC.

A conflict will exist between the interests of FCC or associated persons of FCC and the interest of the client. This statement is required of any investment advisor that provides financial planning advice to California residents. This statement is provided for California residents pursuant to California Rule 260.235.2; residents of other states should be aware that this statement may be applicable to them as well.

Clients contracting with FCC for PFAP will contract with FCC for a period of one (1) year with the contract automatically renewing annually until services are terminated in writing. During that period, clients may contact FCC with questions regarding any areas of financial concern. FCC will also provide advice on accounts maintained with outside custodians where associated persons of FCC will not act as the investment adviser representative and clients will be solely responsible for the implementation of transactions in the account.

FCC will not provide investment advice, trading assistance, nor assume any responsibility for investment results. FCC will not be obligated to provide any other services such as reporting or any other ancillary services associated with the account. In the case of establishing employee defined contribution plans for these organizations, FCC will not advise employee participants on investment selection, as employee participants are free to make their own investment selections or receive selection advice from their own trusted advisor.

From time to time, at their own discretion, employees may solicit FCC's advice through normal and customary procedures, including contacting FCC's office, signing an FCC agreement, and paying a fee for FCC's advice. This would constitute a formal relationship with FCC's advisory services. Under a formal relationship, the employee would receive all of the usual and customary benefits that clients are entitled to. However employee participants are under no obligation to solicit this type of relationship in order to utilize the no commission, no advisory fee custodial services. Because this service is a benefit to the institution, employees of such organizations must maintain employment with the institution in order to receive the no commission, no advisory fee services. In the event that an employee terminates employment in the organization for any reason, he/she will be charged a fee based upon the MAP account fee schedule.

FCC works with business owners to establish employee benefits programs, including the establishment of defined benefit and defined contribution plans for its employees for a fee to be charged to the employer. FCC may act as an intermediary between business owners and Third Party Administrators (TPAs) to help business owners obtain benefits for their employees. A fee may be charged for this service. In addition, FCC may act as an advisor for

company retirement plans for which it may charge an asset management/advisory fee.

## *Fees and Compensation*

Form ADV Part 2A, Item 5

FEES. Client shall pay FCC a one (1%) percent initial portfolio development fee and a prorated one-quarter (1/4) annual fee and a one-quarter (1/4) annual administrative fee at the time of account establishment. Beginning in subsequent quarters, the firm will collect the customary one-quarter (1/4) fee (based upon the annual rate and annual administrative fee rate.) Beginning year two, the quarterly advisory fee and the administrative fee, based upon the annual rate as indicated below, will be charged at the beginning of each quarter based on the Client's assets under management. Fees will be deducted directly from client accounts. If client desires FCC to provide investment management services for client accounts held away, such as employer defined contribution plans, educational 529 plans, or assets held with other custodians, the dollar amounts will be included in the total account size and clients will be billed at the end of each quarter according to the same schedule.

The one (1%) percent Portfolio Development Fee will be charged in situations where new money in which is transferred into an account at the firm's discretion. So, the one (1%) percent portfolio development fee would be charged on, for example, large roll-overs.

### ANNUAL FEE

MAP Account participants will pay an annualized investment advisory fee in accordance with the following schedule:

Account Size	Maximum Annual Fee*
Under \$50,000	2.00%
	Plus separate hourly consulting fees.
\$50,000 – 99,999	1.75%
\$100,000 – 249,999	1.50%
\$250,000 – 499,999	1.25%
\$500,000 – 749,999	1.00%
\$750,000 – 999,999	0.90%
\$1,000,000 – 1,999,999	0.80%
\$2,000,000 +	0.70%

INITIAL PORTFOLIO DEVELOPMENT FEE 1.00% Covers initial expense of setting up portfolio and extra first year financial planning.

ADMINISTRATIVE FEE 0.50% Covers trading and annual financial planning advisory service.

Clients are solely responsible for paying, if any, all custodian fees, wire charges, exchange and other fees charged by banks, custodians, brokers, mutual funds or insurance companies. Custody of funds is maintained by the various clearing firms, insurance companies or other custodians not by FCC.

Either FCC or the client may terminate the MAP Agreement at any time upon written notice to the other by certified mail, which shall be effective when received by the other party. Termination of the Agreement shall not, in any case, affect or preclude the consummation of any transaction initiated prior thereto. In the event that the client shall die or be declared incompetent, the authority of FCC to continue to act under the terms of the MAP Agreement shall continue until such time as FCC is notified in writing of the death or incompetence of the client. FCC does not represent and will not represent that MAP's charges, expenses, fees, etc. are the same

as or lower than that charged to other clients, either by FCC or by other investment advisers or money managers. In light of the services provided by FCC, including research, supplemental advisory and client-related services, the client's annual "costs" in a MAP Account may be excessive than in the market place or you may be able to find at a lower price.

FCC charges a fee for PFAP which typically ranges from \$500-\$5,000, or on an hourly basis of \$250, with a minimum fee of the lesser of \$500 or one-half of the total fee. Fees will be determined by FCC based on the extent and complexity of the individual client's personal circumstances, the client's gross income, the client's net worth and the complexity of the services being provided. The client and FCC will determine the exact fee. All fees are negotiable and are agreed upon prior to entering into a contract with the client.

PFAP fees are typically collected at the time of the engagement. However, in some instances special fee paying arrangements may be made between FCC and the client. Fees are due and payable upon receipt of such billing notice. Fees of more than \$500 will never be collected more than six (6) months in advance.

Either party may terminate services at anytime by providing written notice to all appropriate parties. If services are terminated within five (5) business days of the client executing a contract with FCC, services will be terminated without penalty (no fees due). After the initial five (5) business days, the client will be responsible for the payment of fees for the time and effort expended by FCC prior to receipt of notice of termination. Employer/Employee Benefits Services Organizations such as business owners, schools, and other for profit and non-profit organizations have a need to provide benefits to their employees. Financial Compass charges employers a fee to advise them on the development of an appropriate benefit program for their employees. The advice will include helping the employer develop a relationship with an appropriate third party administrator. Financial Compass will also help the organization establish an appropriate retirement plan and charge the firm a fee for servicing the plan and providing access to appropriate custodians. Financial Compass will not take custody of retirement plan assets.

#### Pro bono Services

At FCC's discretion, FCC may from time to time assist nonprofit organizations in financial planning issues related to the organization. Services that may be included, but not limited to, are the establishment of employee benefit plans for the organization (such as public schools), establishment of 501(c)3 charitable foundations, design, implementation and establishment of an investment policy statement, and offering of access to purchase load and no load investments in a brokerage account through arrangements that FCC has or may have through custodial relationships that it maintains.

All fees are negotiable and may be discounted in certain circumstances. The fees charged will never be based on the capital gains or the capital appreciation of any funds of any client.

***Performance-Based Fees and Side-By-Side Management***

Form ADV Part 2A, Item 6

None.



### *Types of Clients*

Form ADV Part 2A, Item 7

Types of clients are individuals, pension plans, profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

The MAP Account is available for individual, corporate and pension accounts. The minimum asset level required to participate in the MAP Account is normally one hundred thousand dollars (\$100,000.00). The minimum for subsequent investments is normally one thousand dollars (\$1,000). However, at its discretion, FCC may open MAP Accounts with less.

***Methods of Analysis, Investment Strategies and Risk of Loss***

Form ADV Part 2A, Item 8

One method of securities analysis is fundamental analysis. When using Fundamental Analysis, we generally rely on, among other things, company earnings, balance sheet variables and management quality which are used to predict the future value of an investment. Data we review is generally considered reliable but we can not guarantee nor have we verified its accuracy. In addition, the data that we review is sometimes subjective in nature and open to interpretation. Even if our data and interpretation of the data is correct, there may be other factors that determine the value of securities other than those considered in Fundamental Analysis. We also use technical analysis, cyclical analysis and charting.

Analysis – FCC is primarily fundamental in its approach to the economy, stock market and individual investments. Fundamental factors, such as corporate earnings, interest rate levels, changing economic policies and overall investment market conditions are all evaluated. FCC first analyzes the economy (domestic and foreign) to determine where it is in the economic/business cycle. Next, the relative attractiveness and risk of various investment alternatives and investment managers are assessed. Technical analysis is used in timing the buy and sell decisions. FCC selects investment managers (mutual funds, REITs, limited partnerships, closed-end funds, etc.) based on:

1. Economic conditions,
2. Relative performance of the investment managers,
3. Risk of management style, and
4. Risk of the investments.

Investment strategies employed are long term purchases which are securities held at least a year, short term purchases which are securities held less than a year, as well as, trading which is securities held less than 30 days, margin transactions and option writing.

Strategies – FCC believes that its fiduciary responsibilities require FCC to tailor portfolio/investment strategies to the needs of the individual client. In general, FCC's investment philosophy is appreciation of principal and/or to maximize current income within the constraints of prudent risk-taking and according to the client's stated objectives. Portfolios are structured not only to meet current objectives, but also to anticipate future needs and changes in longer-term goals. MAP is a long-term investment management service that requires at least four years to develop properly. FCC generally will not accept clients who wish to use MAP for periods of time less than four years.

Listed above are some of the primary risks associated with the way we recommend investments to you, please do not hesitate to contact us to discuss these risks and others in more detail.

***Investing in securities involves risk of loss that you should be prepared to bear.***

***Disciplinary Information***

Form ADV Part 2A, Item 9

None.

### *Other Financial Industry Activities and Affiliations*

Form ADV Part 2A, Item 10

Financial Compass outsources many activities to third party firms to provide client services. These firms include, but are not limited to TD Ameritrade Institutional for brokerage and trading services, MoneyGuide Pro and eMoney Advisor for financial planning, account aggregation and documentation storage software, Investigo for portfolio reporting and documentation storage, and Junxure for Client Relationship Management software. Personal data shared with these firms is only used for the purpose of providing clients with quality financial services from Financial Compass. Clients will not be solicited from these firms and your personal data will not be sold or shared by any of these firms. At the discretion of Financial Compass, as new technologies continually evolve to provide faster and more efficient services for clients, other companies may be used by Financial Compass.

FCC's investment advisor representatives may act as the advisory client's representative in the execution of securities transactions on a normal and customary basis. The applicable provisions of Section 206 of the Investment Adviser's Act of 1940 are strictly complied within the execution of each transaction.

The associated persons of FCC may offer the services of various third-party investment advisers. Clients shall receive the third-party adviser's Form ADV Part II or equivalent brochure.

The associated persons of FCC may act as a consultant to other financial planning firms and receive normal and customary compensation from that/those firm(s) while acting in that capacity.

Associated persons of FCC are licensed life, health and accident, Long-Term Care, and Variable Annuity insurance brokers with all the appropriate state Departments of Insurance. Associated persons may receive customary commissions on insurance products sold. In such instances, there is no advisory fee associated with these insurance products.

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

Form ADV Part 2A, Item 11

FCC has adopted a written Code of Ethics pursuant to SEC Rule 204A-1 which some state regulators require as well. The Code of Ethics, among other things, sets forth the responsibilities and obligations of associated persons with respect to such issues as personal trading and insider trading restrictions. The firm's Code of Ethics is available upon request to clients and prospective clients.

The client understands that FCC, may perform advisory services for various other clients, and that FCC may give advice or take action for those clients that differs from the advice given or the timing or nature of any action, taken for the client's Account. In addition, FCC may, but is not obligated to, purchase, sell or recommend for purchase or sale any security that FCC may purchase or sell for their own account or the accounts of any other client. In no event will FCC be obligated to effect any transaction for the client that it believes would violate any applicable state or federal law, rule or regulation of any regulatory or self-regulatory body.

It is the express policy of FCC that all persons employed by FCC will act in a fiduciary capacity at all times in the best interests of the client.

FCC or individuals associated with FCC may buy or sell securities identical to those recommended to customers for their personal accounts. Additionally, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

Further noted that FCC is in and shall continue to be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, FCC has adopted a firm wide policy statement outlining insider trading compliance by FCC and its associated persons and other employees of FCC and has been signed and dated by each such person. A copy of such firm-wide policy is left with such person and the original is maintained in a master file. Further, FCC has adopted a written supervisory procedures statement highlighting the steps which shall be taken to implement the firm-wide policy.

These materials are also distributed to all associated persons and other employees of FCC, are signed, dated and filed with the insider compliance materials. There are provisions adopted for:

1. restricting access to files
2. providing continuing education
3. restricting and/or monitoring trading on those securities of which FCC's employees may have non-public information
4. requiring all of FCC's employees to conduct their trading through a specified broker or reporting all transactions promptly to FCC, and
5. monitoring the securities trading of the firm and its employees and associated persons.

FCC does not permit the aggregate blocking of personal securities transactions with those of advisory clients. As these situations may represent a conflict of interest, FCC has established the following restrictions in order to comply with its fiduciary responsibilities:

1. A director, officer or employee of FCC shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No associated person of FCC shall

prefer his or her own interest to that of the advisory client. 2. FCC maintains a list of all securities holdings for itself, and anyone associated with its advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by Mr. Robert S. Davis, President. 3. FCC emphasizes the unrestricted right of the client to decline to implement any investment advice rendered, except in situations where FCC is granted discretionary authority over the client's account. 4. FCC requires that all directors, officers and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. 5. Any director, officer or employee of FCC found to have failed to observe the above-listed principles may be subject to internal disciplinary sanctions which may include termination.

## ***Brokerage Practices***

Form ADV Part 2A, Item 12

Clients are solely responsible for paying, if any, all custodian fees, wire charges, exchange and other fees charged by banks, custodians, brokers, mutual funds or insurance companies. Custody of funds is maintained by the various clearing firms, insurance companies or other custodians not by FCC.

With respect to brokerage services to avoid a conflict of interest, FCC will neither charge a commission nor collect an advisory fee on the account. Account owners and/or its board of directors will be responsible for all costs incurred in establishing and maintaining the account, such as setup fees, transaction fees and any other fees associated with maintaining the account that are not related to commissions or advisory fees.

Under this arrangement, FCC will not provide investment advice, trading assistance, nor assume any responsibility for investment results. FCC will not be obligated to provide any other services such as reporting or any other ancillary services associated with the account.

The associated persons of FCC may suggest that clients use one or more brokerage firms for executing securities transactions. Clients are not obligated to use the recommended brokerage firm and are free to use the broker/dealer or brokerage firm of their choice. Client transactions will be charged according to the selected brokerage firm's then-current commission schedule and clients may pay higher rates and other fees than otherwise available. The client may be assessed transaction fees charged by custodians and/or product sponsors, in addition to normal and customary fees, all of which are fully disclosed to the client. These fees and expenses are separate and distinct from any financial planning, financial advisory and financial consulting fee(s) charged by associated persons of FCC.

### **ADDITIONAL COMPENSATION**

Applicant uses the services of qualified custodians and as a result of this arrangement, there will be certain "soft dollar" benefits in force."

### *Review of Accounts*

Form ADV Part 2A, Item 13

Clients contracting for PFAP who have accounts not managed by FCC will have their accounts reviewed upon client request to FCC since the client will need to supply FCC with a copy of any statements relating to the accounts. Clients contracting for financial consultation services will not receive any on-going reviews since services terminate upon completion of the consultation. Clients may contract for additional reviews for a separate fee. Managed Account Program Accounts are monitored on an on-going basis and reviews will be performed at least quarterly with the calendar being the triggering factor. Material market changes, economic or political events or a material change in the client's financial situation may trigger more frequent reviews. In addition, FCC will be available to consult with the client concerning the MAP Account at the client's request. Robert S. Davis, President, performs all reviews of client's MAP Accounts. Other members of the FCC staff may prepare some or all the analyses and/or recommendations under Mr. Davis' direction.

Clients will receive confirmations and statements from the broker/dealer, broker/dealer clearing firm, custodian, investment company and/or money manager at which the client's account(s) are maintained. In the event the client chooses, at his or her discretion, to implement any of the financial advisory recommendations through an associated person of FCC in their capacity as an investment advisor representative, client may receive monthly, quarterly and/or annual statements from investment companies, product sponsor's broker/dealer and/or custodians.



*Client Referrals and Other Compensation*

Form ADV Part 2A, Item 14

FCC may receive solicitor referral fees from other organizations.

FCC is an active member in several professional organizations. In order to be a member of these organizations, FCC pays an annual membership fee. One of the benefits of membership is participation in a referral network that may result in FCC obtaining new clients

**ADDITIONAL COMPENSATION**

Applicant uses the services of qualified custodians and as a result of this arrangement, there will be certain “soft dollar” benefits in force.”

*Custody*

Form ADV Part 2A, Item 15

None. Clients are solely responsible for paying, if any, all custodian fees, wire charges, exchange and other fees charged by banks, custodians, brokers, mutual funds or insurance companies. Custody of funds is maintained by the various clearing firms, insurance companies or other custodians not by FCC.

***Investment Discretion***

Form ADV Part 2A, Item 16

The client grants FCC complete and limited discretionary trading authorization with respect to the purchase and sale of mutual funds, equity securities, fixed income securities and variable annuity sub-account allocations. The client appoints FCC as its agent and attorney-in-fact with respect to this trading authorization. The client also authorizes FCC, acting at the client's direction, to effect transactions in other securities approved by FCC for investment in the MAP Account. At FCC's option, the client may transfer other types of investments into the Account and not be charged an advisory fee. The client understands that the trading authorization is a continuing one and shall remain in full force and effect and be relied upon until FCC has received a copy of written termination notice, which will be deemed to terminate the MAP Account effective when received by the other party.

*Voting Client Securities*

Form ADV Part 2A, Item 17

The firm does not vote proxy statements on behalf of advisory clients.

***Financial Information***

Form ADV Part 2A, Item 18

No financial reporting is required since the firm does not receive fees more than six months in advance.

## *Requirements for State-Registered Advisers*

Form ADV Part 2A, Item 19

**Robert S. Davis**-Born 1961- Founder; President; Director, Chief Investment Strategist of Financial Compass Corporation, a Minnesota state Registered Investment Advisory firm, 2005 to present. A Registered Representative, Waddell & Reed, a national financial services organization, 2005. An investment advisor representative of Fure Financial Corporation, 1998 to 2004. Registered Representative, Commonwealth Financial Network, an FINRA broker/dealer, 2002 to 2004. Registered Representative, Securities America, Inc., a national broker/dealer, 1998-2002. Consultant, Recruiter, U.S. Peace Corps, Dallas, TX, 1990-1992. Business Consultant, U.S. Peace Corps – Dominican Republic, 1986-1989. EDUCATION: Michigan State University, M.S. 1996; Mankato State University, B.S. Business Administration, 1985 EXAMINATIONS: Certified Financial Planner, 2003. FINRA exams: Series #66, 2005; Series #7, 1998; Series #63, 1997.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard

of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

*Additional Information*

None.



**Robert Stai Davis, CFP**

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Eden Prairie, Minnesota 55344**

**Phone: 952-921-2121**

**April 22, 2015**

**FORM ADV PART 2B. BROCHURE SUPPLEMENT**

**This brochure supplement provides information about Robert Stai Davis, CFP that supplements the Financial Compass Corporation brochure. You should have received a copy of that brochure. Please contact Robert Stai Davis, President/Director if you did not receive the Financial Compass Corporation Brochure supplement.**

**Additional information about Robert Stai Davis is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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### *Educational Background and Business Experience*

Form ADV Part 2B, Item 2

**Robert S. Davis**-Born 1961- Founder; President; Director, Chief Investment Strategist of Financial Compass Corporation, a Minnesota state Registered Investment Advisory firm, 2005 to present. A Registered Representative, Waddell & Reed, a national financial services organization, 2005. An investment advisor representative of Fure Financial Corporation, 1998 to 2004. Registered Representative, Commonwealth Financial Network, an FINRA broker/dealer, 2002 to 2004. Registered Representative, Securities America, Inc., a national broker/dealer, 1998-2002. Consultant, Recruiter, U.S. Peace Corps, Dallas, TX, 1990-1992. Business Consultant, U.S. Peace Corps – Dominican Republic, 1986-1989. EDUCATION: Michigan State University, M.S. 1996; Mankato State University, B.S. Business Administration, 1985 EXAMINATIONS: Certified Financial Planner, 2003. FINRA exams: Series #66, 2005; Series #7, 1998; Series #63, 1997.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

***Disciplinary Information***

None.

***Other Business Activities***

Form ADV Part 2B, Item 4

Mr. Davis is a licensed life, health and accident, long-term care, and variable annuity insurance brokers with all the appropriate state Departments of Insurance. He will receive customary commissions on insurance products sold. In such instances, there is no advisory fee associated with these insurance products.

*Additional Compensation*

Form ADV Part 2B, Item 5

Mr. Davis is a licensed life, health and accident, long-term care, and variable annuity insurance brokers with all the appropriate state Departments of Insurance. He will receive customary commissions on insurance products sold. In such instances, there is no advisory fee associated with these insurance products.

*Supervision*

Form ADV Part 2B, Item 6

Not applicable.



***Requirements for State-Registered Advisers***

Form ADV Part 2B, Item 7

No response appropriate.