

Form ADV Part 2A
Investment Advisor Brochure



Cover Page

January 14, 2018

Name of Registered Investment Advisor	CPR Investing
Address	15237 S. 19 th Way Phoenix, AZ 85048
Phone Number	602-616-2200
Website Address	www.cpr-investing.com
E-mail Address	info@cpr-investing.com
Date of Last Revision	February 12, 2017

This Form ADV Part 2A (Investment Advisor Brochure) gives information about the investment advisor and its business for the use of clients and prospective clients. If you have any questions about the content of this brochure, please contact us at 602-616-2200 or info@cpr-investing.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of skill or training.

Additional information about our firm is available on the SEC’s website at: www.adviserinfo.sec.gov.

Attached to the end is a copy of CPR Investing Privacy notice.

Material Changes

The purpose of this section is to discuss only material changes since the last annual update of CPR Investing's Investment Advisor Brochure. The date of the last annual update was February 12, 2017.

Summary of Material Changes:

1. Update to Assets Under Management
2. Update to Fee Schedule

Delivery:

Within 120 days of our fiscal year end we will deliver our annual Summary of Material Changes if there have been material changes since the last annual updating amendment.

Table of Contents

MATERIAL CHANGES	2
TABLE OF CONTENTS	3
ADVISORY BUSINESS	4
FEES AND COMPENSATION	4
PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT	5
TYPES OF CLIENTS AND ACCOUNT MINIMUMS	5
METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS	5
DISCIPLINARY INFORMATION	5
OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS	6
CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, AND PERSONAL TRADING	6
BROKERAGE PRACTICES	6
REVIEW OF ACCOUNTS AND REPORTS ON ACCOUNTS	6
CUSTODY	7
INVESTMENT DISCRETION	7
VOTING CLIENT SECURITIES	7
FINANCIAL INFORMATION	7
REQUIREMENTS FOR STATE REGISTERED ADVISORS	8

Advisory Business

Advisory Firm

CPR Investing has been providing investment advisory services since 1994. Seamus Mulloy is the founder and President and has been in the financial services industry since 1986.

Advisory Services

CPR Investing provides supervisory services since 1994. The various management options consist of five CORE portfolios. There are also Non-CORE portfolios that are provided for unique client situations. Within the CORE portfolios, two of them utilize mutual funds exclusively, two utilize individual stocks exclusively and one portfolio utilizes a combination of individual stocks and mutual funds. The management style for these CORE portfolios consists of Growth, Growth & Income and Income. The Non-CORE portfolios are determined due to clients having specific and unique financial situations. Other investments may include 529 College Savings Plans, variable annuities and variable life products. CPR Investing serves individuals, trusts, foundations and employer sponsored retirement plans as well as personal retirement plans.

As of December 31, 2017 CPR Investing has \$20,023,053.44 of assets under supervision on a discretionary basis, and \$0 of assets under supervision on a non-discretionary basis.

Services are based on the individual needs of the client. An initial interview and data gathering questionnaire is undertaken to determine the client's financial situation and investment objectives, and to give the client the opportunity to impose reasonable restrictions on the management of the account. Clients have the ability to leave standing instructions with the IA Rep to refrain from investing in particular securities or types of securities, or invest in limited amounts of securities. Quarterly the IA Rep will notify the client in writing to contact the IA Rep if there have been any changes in the client's financial situation or investment objectives, or to impose or modify account restrictions. The IA Rep will contact or attempt to contact the client annually on these matters. It is the client's responsibility to notify the IA Rep at any time there are changes. Clients may call in at any time during normal business hours to discuss directly with the IA Rep about the client's account, financial situation, or investment needs. Clients will receive from the custodian/brokerage firm timely confirmations and at least quarterly statements containing a description of all transactions and all account activity. The client will retain rights of ownership of all securities and funds in the account to the same extent as if the client held the securities and funds outside the program. In addition to custodial statements, CPR Investing sends quarterly reports to the client, it is the client's responsibility to compare statements from TD Ameritrade and CPR Investing and report any discrepancies.

CPR Investing attempts to provide portfolio management consistent with the individual client's financial and tax status and risk/reward objectives. Management may be comprehensive or segmented and focus on various investment vehicles such as mutual funds, individual stocks and annuities.

Fees and Compensation

Our advisory fees are based on a percentage of the current market value of the assets in your account and are described in detail in the Client Agreement between you and the firm. Annualized fees will be no more than 1.5% of the account value. Fees are negotiable under special circumstances and at the approval of CPR Investing. These fees are for advisory services only and do not include any transaction fees or commissions, which may be charged separately by the broker/dealer custodial firm. See the section heading Brokerage Practices for more information.

For Portfolio Management, the fee will be payable quarterly in advance. The first payment is assessed and due at the end of the first calendar quarter and will be assessed pro rata in the event the Agreement is executed at any time other than the first day of the current calendar quarter. Subsequent payments are due and will be assessed on the first day after the end of each calendar quarter based on the value of the account assets under supervision as of the close of business on the last business day of that quarter. Payment of fees may be paid direct by the client, or client may authorize the custodian holding client funds and securities to deduct CPR Investing advisory fees direct from the client account in accordance with statements prepared and submitted to the custodian by CPR Investing. The custodian will provide periodic account statements to the client. Such statements will reflect all fee withdrawals by CPR Investing. It is the client's responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated. The client will receive a copy of the

same billing statement, submitted to the custodian.

Fees are not collected for services to be performed more than six months in advance.

For Portfolio Management, services will continue until either party terminates the Agreement on immediate written notice.

If termination occurs prior to the end of a calendar quarter, a pro-rata refund of unearned fees will be made to the client.

The Advisory Agreement contains a pre-dispute arbitration clause. Client understands that the agreement to arbitrate does not constitute a waiver of the right to seek a judicial forum where such a waiver would be void under the federal securities laws. Arbitration is final and binding on the parties.

Performance-Based Fees and Side-By-Side Management

CPR Investing does not charge performance-based fees, which is based on capital gains in the client account.

Types of Clients and Account Minimums

CPR Investing provides advisory services to individuals, pension and profit sharing plans and other ERISA accounts, trusts, estates, and business entities.

There is no minimum for clients retaining financial planning services.

Methods of Analysis, Investment Strategies, and Risk of Loss

Analysis utilized includes charting, fundamentals, technical, and cyclical.

CPR Investing uses asset allocation strategies for portfolio management.

By its nature, financial planning looks to the long-term. After the client's short-term cash needs and emergency fund is evaluated, investment and insurance strategies are designed to help the client achieve his or her financial goals. Casualty insurance (e.g. homeowner's, auto, liability, etc.) is reviewed only at the client's request, and would be provided by an outside casualty firm.

While there is risk in all investments, some carry a greater degree of risk or higher costs. There is no guarantee that the investment strategy selected for the client will result in the client's goals being met, nor is there any guarantee of profit or protection from loss. For those investments sold by prospectus, clients should read the prospectus in full.

CPR Investing is disclosing those risks and opportunities for our investment strategy or for particular types of securities used.

- By timing the buys and sells, we endeavor to control the risks. Timing the markets has its own set of risks.
- There are tax consequences for short-term trading wherein capital gains are taxed as ordinary income.
- Our investment style is a non-diversified approach.

Disciplinary Information

An investment advisor and its supervised persons must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of its management personnel. CPR Investing as a firm does not have any disclosure items. IA Rep Bruce Read has disclosure items please refer to the Brochure Supplement for a description.

Other Financial Industry Activities and Affiliations

Seamus Mulloy is licensed with a life, disability, and insurance company. Insurance products offered by these companies may be recommended. If clients purchase these products through us, we receive the normal commissions. Thus a conflict of interest exists between our interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through us or through these insurance companies.

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

Code of Ethics

CPR Investing maintains a Code of Ethics. The Code of Ethics sets forth standards of conduct expected of advisory personnel; requires compliance with federal securities laws; and, addresses conflicts that arise from personal trading by advisory personnel. Clients may request a copy of the Code of Ethics.

Personal Trading

At times CPR Investing may take positions in the same securities as clients, and we will try to avoid conflicts with clients. The firm will generally be “last in” and “last out” for the trading day when trading occurs in close proximity to client trades. We will not violate our fiduciary responsibilities to our clients. Scalping (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (i.e. a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

Brokerage Practices

Selection or Recommendation of Broker/Dealers

Because the principal is a Registered Investment Advisor who utilizes TD Ameritrade Investment Advisory Service, if clients freely choose to implement advice through us, the broker/dealer is TD Ameritrade. TD Ameritrade performs “due diligence” on mutual funds and insurance products. Only those investments that meet firm requirements will be on the TD Ameritrade “approved product list” and be offered for sale to clients.

CPR Investing is not directly affiliated with TD Ameritrade and do not receive any commissions or fees from recommending their services.

Review of Accounts and Reports on Accounts

Reviews

All accounts are reviewed each month, to monitor the portfolios for investment objectives and other supervisory review. All reviews are performed by the Investment Advisors.

The financial plan is a snapshot in time and no ongoing reviews are conducted. We recommend clients engage us on an annual basis to update the financial plan.

Reports

All clients receive standard account statements from investment sponsors and TD Ameritrade. Clients will also receive a written quarterly report from CPR Investing.

Custody

Although client assets are held at a third-party independent custodian (TD Ameritrade), CPR Investing is deemed to have custody of client funds solely because of the fee deduction authority granted by the client in the investment advisory agreement. Except for this fee deduction, we do not have authority to withdraw funds out of client accounts.

Clients will receive account statements at least quarterly from the broker-dealer or other qualified custodian. Client is urged to compare custodial account statements against statements prepared by CPR Investing for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of your account for tax purposes.

Investment Discretion

CPR Investing maintains full discretion under a limited power of attorney as to the securities and amount of securities.

CPR Investing will not have authority to withdraw funds or to take custody of client funds or securities, other than under the terms of the Fee Payment Authorization clause in the Agreement with the client.

Voting Client Securities

CPR Investing does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

Financial Information

An investment advisor must provide financial information if a threshold of fee prepayments is met; there is a financial condition likely to impair the ability to meet contractual commitments; or, a bankruptcy within the past ten years. CPR Investing as a firm does not have any disclosure items in this section. Investment Advisor Representative Bruce Read has a disclosure event which is described in his Brochure Supplement.

Requirements for State Registered Advisors

Seamus Mulloy is President, Chief Executive Officer and Chief Compliance Officer. Bruce Read is an Investment Advisor Representative. For a complete educational background of Seamus and Bruce, please refer to the Brochure Supplement.

Other Business Activities

Seamus Mulloy is a practicing Physician, where his practice requires 60% of his time. Seamus Mulloy is also part owner of a SurgiCenter.

Seamus Mulloy is in the business of Investment Management of portfolio and insurance sales. These business activities represent approximately 40% of time and income.

Bruce Read is in Customer Service, Private Label, at NationStar Mortgage and devotes 60% of his time. Bruce Read is also an Investment Advisor Representative with CPR Investing where this requires 40% of his time.