

Commonwealth Retirement Investments, LLC

Customer Relationship Summary as of 6/30/2020

Introduction

Commonwealth Retirement Investments, LLC (referred to here as “us,” “we,” “our firm”), is providing this Customer Relationship Summary as part of Regulation Best Interest. Our firm does business publicly under a different name than our legal name. Publicly, you can find us under the name Commonwealth Retirement Advisors. Throughout this summary we have called out some “conversation starters” which you may wish to discuss with us as you get to know us better. We have identified these items as bullet points throughout this summary.

Our firm is a federally registered investment advisor with the Securities Exchange Commission. Registration does not imply any level of skill or training. Brokerage and investment advisory services and fees differ- it is important for you to understand the difference. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Our firm makes recommendations under Regulation Best Interest and is providing this document to give you more information about our relationship with you as a client.

What investment services and advice can you provide me?

Our firm offers ongoing advisory services to our clients. We offer various models based on your needs. Once we have met you and discussed your goals, we choose what we believe is the most appropriate allocation and model to suit your needs. Our firm actively monitors your investments on a daily basis. Our firm accepts discretion. Discretion means that we will not contact you for trade decisions and other decisions as discussed in our Firm Brochure. Our firm has certain limitations on the products we offer. We limit our product offerings to: Debt Instruments, Equities, Exchange Traded Funds, Insurance Products (both variable and fixed), and Mutual Funds. In order to establish a relationship with our firm, we require clients to have a minimum investment of \$500,000; however, we may, on occasion, waive this minimum investment.

You can learn more about our firm by reviewing our entire Firm Brochure which should be made available to you prior to or at the time of account opening and can be found at advisoryinfo.sec.gov.

- **Given my financial situation, should I choose an investment advisory service? Why? How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

What fees will I pay?

Our firm charges asset-based fees and fixed fees. Our asset-based fees are based on the value of your account. We charge an advisory fee based on the contract you sign. This fee is charged on a quarterly basis, also described in your contract and in our Firm Brochure. Our fixed fees are negotiated at the time we sign a contract with you.

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. 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?**

What are your legal obligations to me when providing recommendations? 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. Here are some examples to help you understand what we mean.

- Some of our financial professionals are insurance licensed and have the ability to sell you insurance products. These products are separate and apart from our advisory business with you, and our financial professionals earn a separate commission on these products. This may present a conflict of interest when advising you about insurance products.
- Schwab, our custodian, makes certain products available that benefit us, but may not benefit you. We have chosen Schwab as our custodian based on a number of factors, but these benefits could be seen as a conflict. You should read our Firm Brochure to further understand our relationship with Schwab.

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

How do your financial professionals make money?

Our financial professionals are primarily paid based on the advisory fees paid to us by our clients. However, as described in our conflicts, some may be paid commissions for certain transactions at Purshe Kaplan Securities or for insurance based transactions.

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

No. You can learn about our legal and disciplinary history at [investor.gov/CRS](https://www.investor.gov/CRS).

■ **As a financial professional, do you have any disciplinary history? For what type of conduct?**

Where can I go for more information?

For more information about our firm we encourage you to go to our website at www.cwealthra.com. You can obtain or request a copy of the most recent Client Relationship Summary. You can also contact us by phone at 804-282-1238 to obtain an up-to-date, free of charge Customer Relationship Summary.

- **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?**

Form CRS – Customer Relationship Summary

We are Purshe Kaplan Sterling Investments, a broker-dealer registered with the Securities and Exchange Commission. We are a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). We provide brokerage accounts and services. We are not an investment advisor. Brokerage and advisory services and fees differ and it is important to understand the differences.

Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Relationships and Services. *What investment services and advice can you provide me?*

We offer brokerage services to retail investors. You can open a brokerage account in which you can buy and sell securities and/or you may open an account directly with an issuer (like a Mutual Fund). Many of the securities we sell are generally described in the "Fees" section below. Additional information regarding our services, accounts and investments can be found at www.pksinvest.com. You may select investments or we may recommend investments for your account, but the ultimate investment decision as to your investment strategy and the purchase or sale of investments will be yours.

Account Monitoring: Unlike advisory accounts, we do not monitor your investments on an ongoing basis.

Limited Investment Offerings: Although we offer a broad range of products, including some proprietary products, we do not offer all products of every type. For example, we offer mutual funds and variable annuities, but not every mutual fund and not every variable annuity product.

Account Minimums and Other Requirements: We do not impose any account minimums. However, our clearing firm and specific product issuers may impose account minimums that we must comply with.

Ask your financial professional: *Given my financial situation, should I choose a brokerage service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What Fees Will I Pay?

The fees you pay are based on the amount you buy or sell and not the total value of your account. You are charged more when there are more trades in your account, so we have an incentive to encourage you to trade often.

With stocks or exchange-traded funds, this fee is usually a commission that **may be up to 5%** of the transaction. With other investments, such as bonds, this fee might be part of the price you pay for the investment (called a "**mark-up**" or "**mark down**"). With mutual funds, this fee (typically called a "**load**") reduces the amount of your investment and **may be up to 8.5%**. Mutual funds with lower up-front charges typically carry higher ongoing fees. For alternative investments, such as REITs or other products purchased directly from an issuer, the **commission may be up to 10%**. This can immediately reduce your initial investment. For variable annuities and insurance, the **commission may be up to 8%**. Unlike mutual funds and alternative investments, the commission your representative receives for placing your annuity with the carrier does not reduce your initial invested amount. In each of these transactions, you will receive a prospectus or other offering document in advance or subsequent trade confirmation that details the amount of the commission or load. Some investments (such as mutual funds and variable annuities) impose additional fees that will reduce the value of your investment over time. Also, with certain investments such as variable annuities, you may have to pay fees such as "**surrender charges**" to sell the investment. These fees are described in detail in a prospectus or other offering document that you receive when you purchase an investment.

We charge you additional fees, such as ticket charges, custodian fees, account maintenance fees, and account inactivity fees. A list of commissions and fees is available at www.pksinvest.com. 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. Please make sure you understand what fees and costs you are paying.

Ask your financial professional: 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?

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, we have to act in your best interest and not put our interests 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 recommendation we provide you. Here are some examples to help you understand what this means.

Proprietary Products are products owned or sponsored by us or an affiliated company. We have a greater incentive to recommend Proprietary Products we offer because we or an affiliated company make additional money when you buy the product.

Third-party Payments. We receive direct payments from third parties when you invest in certain products, such as mutual funds. We have an incentive to recommend products that pay additional compensation to us over products that pay a lesser amount or none at all.

Revenue Sharing is where a company that sponsors or manages another company you invest in shares a portion of management or other fees it earns from your account. We have an incentive to recommend products that share with us revenue received from your account over products that pay a lesser amount or none at all.

Principal Trading. Primarily with bonds or fixed income products, we have an incentive to act against your best interests to generate additional compensation.

This summary does not detail all of our conflicts of interest or all material facts regarding our conflicts of interest. For additional information on our conflicts of interest, please visit www.pksinvest.com/regbidisclosures.

Ask your financial professional: How might your conflicts of interest affect me, and how will you address them?

How Do Your Financial Professionals Make Money?

Our Financial Professionals make money by sharing in a percentage of the commission or load you pay us when you purchase a security. Commissions and loads are described in the *Fees* section above. Financial Professionals who generate higher commissions for the Firm receive a higher percentage share of the commissions. *Therefore, Financial Professionals have an incentive to increase sales in your and other customer accounts.*

Do You or Your Financial Professionals Have Legal or Disciplinary History?

Yes. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Ask your financial professional: As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

For additional up to date information about our brokerage services, please visit www.pksinvest.com or call 800-801-6851. For a copy of this Form CRS, please visit www.pksinvest.com/regbidisclosures. If you have received this form electronically and prefer a paper copy, please call us at 800-801-6851. If you have a problem with your investments, account or financial professional, contact us in writing at complianceinfo@pksinvest.com or by mail at 80 State St. Albany, NY 12207.

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

ITEM 1: COVER SHEET

INFORMATIONAL BROCHURE FORM ADV PART 2A

COMMONWEALTH RETIREMENT INVESTMENTS LLC
d/b/a



9030 Stony Point Parkway, Suite 580 Richmond, VA 23235
804-282-1238 www.cwealthra.com

Ryan Drake, Principal

Version March 30, 2020

This brochure provides information about the qualifications and business practices of Commonwealth Retirement Advisors. If you have any questions about the contents of this brochure, please contact us at 804- 282-1238. 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. Our registration does not imply a certain level of skill or training. Additional information about Commonwealth Retirement Advisors (CRD# 285998) is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2: STATEMENT OF MATERIAL CHANGES

Commonwealth Retirement Advisors is required to disclose any material changes. There are no material changes to this brochure since our most recent filing in May 2019.

ITEM 3: TABLE OF CONTENTS

TABLE OF CONTENTS

Item 1:	Cover Sheet.....	1
Item 2:	Statement of Material Changes.....	2
Item 3:	Table of Contents.....	3
Item 4:	Advisory Business	4
Item 5:	Fees and Compensation.....	5
Item 6:	Performance-Based Fees	7
Item 7:	Types of Clients.....	7
Item 8:	Methods of Analysis, Investment Strategies and Risk of Loss.....	7
Item 9:	Disciplinary Information.....	12
Item 10:	Other Financial Industry Activities and Affiliations	12
Item 11:	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	13
Item 12:	Brokerage Practices.....	14
Item 13:	Review of Accounts	16
Item 14:	Client Referrals and Other Compensation.....	17
Item 15:	Custody.....	17
Item 16:	Investment Discretion	17
Item 17:	Voting Client Securities	17
Item 18:	Financial Information	18

INFORMATIONAL BROCHURE
COMMONWEALTH RETIREMENT ADVISORS

ITEM 4: ADVISORY BUSINESS

Commonwealth Retirement Advisors (“CRA”) has been in business since January 2017. Ryan Drake is the firm’s principal. Mr. Drake has been advising clients for over 15 years and was formerly an independent financial advisor with Lincoln Financial Advisors.

CRA provides personalized financial planning and/or investment management services to individuals and families. Specifically, CRA focuses on the big picture of retirement, and creating an effective pathway to reach your retirement goals. Commonwealth focuses its efforts on clients that are in and near retirement along with their families.

CRA’s comprehensive planning process starts with a discovery meeting which is spent getting to know you and developing an understanding of your priorities both financial and non-financial. During this session, we will review your statements and other important documents. From there, we will go to work and form a plan to address how you can best meet your retirement objectives while effectively managing risks. Once we have developed a set of observations and reviewed our findings with you, we will focus on specific long-term investment strategies which could be effective in helping you to reach your retirement goals. At this point, we should both (CRA and you) decide as to whether we should engage in a longer-term relationship whereby you would have us manage all or part of your investments. We can also continue to provide you with ongoing financial planning advice. We generally provide ongoing financial planning advice only to our asset management clients.

We perform asset management services on a discretionary basis. This means that while we will continue an ongoing relationship with each client, being involved in various stages of their lives and decisions to be made, we do not seek specific approval of changes to client investment accounts. Because we take discretion when managing accounts, clients engaging us will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and CRA. We believe that most clients are best served through this type of arrangement.

In limited circumstances, we provide asset management services on a non-discretionary basis, which means we will manage the clients’ accounts as we do for our discretionary clients, except we will consult with the client prior to implementing any investment recommendation. Clients should be aware that some recommendations may be time-sensitive, in which case recommendations not implemented because we are unable to reach a non-discretionary client may not be made on a timely basis and therefore a client’s account may not perform as well as it would have had CRA been able to reach the client for a consultation on the recommendation.

Assets Under Management

As of December 31, 2019, CRA had approximately in \$161,556,185 assets under management across 245 households. Of these assets, \$161,556,185 were managed on a discretionary basis.

ITEM 5: FEES AND COMPENSTION

A. Fees Charged

All investment management clients are required to execute an Investment Management Agreement that will describe the type of management services to be provided and the fees we charge, among other items. Clients are advised that they may pay fees that are higher or lower than fees they may pay another advisor for the same services and may in fact pay lower fees for comparable services from other sources. Clients are under no obligation at any time to engage or to continue to engage, CRA for investment management services. If you do not receive a copy of this brochure at least 48 hours prior to the execution of an Agreement, you may terminate the agreement within the first five (5) business days without penalty.

Asset Management

Our fee schedule is listed below. In limited circumstances fees are negotiable.

<i>Billable Assets Under Management</i>	<i>Annual Rate</i>
First \$1,000,000	1.00%
Next \$1,000,000	0.85%
Amount over \$2,000,000	0.55%

For clients with billable assets totaling over \$5,000,000 fees may be negotiated.

Financial Planning

If financial planning is done on a stand-alone basis, the fees charged are based on the fee agreed upon by CRA and the client. The arrangement is provided on a fixed fee basis, and the fixed fees will range from \$1,000 to \$2,500. Financial planning fees are negotiable and may be waived at the discretion of CRA. These fees are dependent on the nature of the engagement and are set on a case-by-case basis. Financial Planning fees are refundable within 30 days of payment in the event you are dissatisfied with the work we do on your behalf.

Ongoing financial planning services provided to asset management clients are generally provided without a separate fee for financial planning.

B. Asset Management:

For clients whose assets are managed by the firm, investment advisory fees will be debited directly from each client's account. The advisory fee is paid quarterly, in advance, and the value used for the fee calculation is the net value as of the last market day of the previous quarter. For example, we will calculate the daily rate for the client given our fee schedule using a 365-day calendar year, then multiply the daily rate by the number of days in the quarter to get the billing rate for the quarter. The calculated quarterly billing rate is then applied to the net value of the last market day of the previous quarter to arrive at the management fee for the current quarter. We do not refund fees based on withdrawals unless the account relationship is terminated. To the extent there is cash in your account, it will be included in the value for the purpose of calculating fees only if the cash is part of an investment strategy. Once the calculation is made, we will instruct your account custodian to deduct the fee from your account and remit it to CRA. While almost all of our clients choose to have their fee debited from their account, we will invoice clients upon request.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian. On at least a quarterly basis, the client will receive a statement from their account custodian showing all transactions in their account, including the fee.

*CRA generally requires a minimum amount of \$500,000 in assets under management to be placed with us. This minimum may be waived in certain circumstances and when the minimum is waived clients are charged up to 1.25% annually as described here.

Financial Planning: Financial planning fees will be due upon receipt of invoice from CRA.

C. Other Fees

There are a number of other fees that can be associated with holding and investing in securities. You will be responsible for fees including transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or commissions for the purchase or sale of a stock, bond or similar securities. CRA does not receive any part of these fees charged by the custodian. Expenses of a fund will not be included in management fees, as they are deducted from the value of the shares by the mutual fund manager. For complete discussion of expenses related to each mutual fund, ETF or similar investment vehicle, you should read a copy of the prospectus issued by that fund. CRA can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

D. *Pro-rata Fees*

If you open an account during a quarter, you will pay a management fee for the number of days left in that quarter. If you terminate our relationship during a quarter, you will be entitled to a refund of any management fees for the remainder of the quarter. Once your notice of termination is received, we will assess pro-rated fees for the number of days between the end of the prior billing period and the date of termination.

E. Compensation for the Sale of Securities.

To permit CRA clients to have access to as many investment solutions as possible, certain professionals of CRA are registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a FINRA member broker-dealer. The relationship with PKS allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with CRA or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to CRA.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with CRA. CRA attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

ITEM 6: PERFORMANCE-BASED FEES

CRA does not charge performance-based fees.

ITEM 7: TYPES OF CLIENTS

Clients advised may include individuals, families, trusts, charitable organizations and foundations. CRA generally requires a minimum amount of \$500,000 in assets under management to be placed with CRA. This minimum may be waived in certain circumstances.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

It is important for you to know and remember that all investments carry risks. Investing in securities involves risk of loss that clients should be prepared to bear.

Each client's portfolio will be invested according to that client's investment objectives, which are ascertained through the financial planning and/or investment onboarding process. Once we ascertain your objectives, we will develop a set of asset allocation guidelines, and then in most cases place the assets in one or more of our investment strategies. The blend of strategies will be customized to your situation and our outlook for various financial markets. Because many of our clients are

similar in that they are in and near retirement, the allocations are often similar. We base our conclusions on predominantly publicly available research, such as regulatory filings, press releases, and research we receive through our custodian as well as other market research providers.

The investment strategies are not investment products. Due to market movements and other factors, not all clients will have exactly the same investment percentages in each of the underlying securities.

The investment strategies that we recommend are based on the needs of the client as compared with the typical behavior of that security type or strategy, current market conditions, your current financial situation and financial priorities. Because we develop an investment strategy based on your personal situation and financial goals, your asset allocation guidelines may be similar to or different from another client. To ensure that each household is being managed as efficiently as possible, CRA has developed portfolios that are aimed to work in tandem with one another, through the use of multiple accounts or by combining strategies in a single account.

We may periodically recommend or make changes to the allocation of client portfolios based on changing conditions in the financial markets, economic outlook or an individual client's objectives. It is important to remember that because market conditions can vary greatly, your asset allocation guidelines are not necessarily strict rules. We may deviate from the guidelines as we believe necessary.

When CRA makes changes to an investment strategy, these changes may not be made simultaneously. Rather, some accounts may be modified before others. This may result in accounts being traded earlier inadvertently having an advantage over accounts traded later. In most cases, changes are made simultaneously. In some situations, CRA may consider tax implications when making a change in a taxable account. Because of this, clients may have differences between portfolios. The complexity of the investment decision making process is increased by adding tax considerations. CRA is cautious about making tax driven decisions. Tax driven decisions can end up increasing the risk of the transaction. There can be no assurance that tax-based decisions will contribute positively to the after-tax total return of the portfolio.

The primary investment strategies we utilize include:

Dividend Growth Portfolio: This strategy focuses on a diversified portfolio consisting of individual companies that are currently paying dividends and that may have the ability to increase those dividends over time. The income generated by these companies may make them appropriate for those in and near retirement. These stocks can and do decline in value from time to time and may not always exhibit less volatility than the overall market. Dividends are not guaranteed and must be declared by the company's Board of Directors. We rely, in part, on a company's history of maintaining and raising their dividends in making our investment decisions. From time to time we may invest in REITS, Master Limited Partnerships (MLPs), ETFs and similar vehicles as part of this strategy.

Our approach to dividend investing is long-term and thus we do not usually attempt to time our investments in various companies on a short-term basis. We do make on going adjustments based on our long-term view for sectors and individual companies.

Dividend Funds: This strategy also seeks to invest in dividend paying companies but does so through publicly available mutual fund, ETFs, ETNs, MLPs and other similar vehicles.

Fixed Income: In this strategy, we manage a diversified group of fixed income oriented mutual funds or individual securities. The selection of funds or securities depends on our view of interest rates, economic growth or decline, and relative value of segments of the global debt markets as well as our assessment of the funds' past performance. Not all clients will be in the same individual securities, as purchases may depend on the available inventory at the time. We may also invest in publicly traded ETFs, ETNs, or preferred securities as part of this strategy.

Annuities: In some situations, CRA may recommend variable annuities and could manage the allocation of the annuity balances to various sub-accounts. Annuity recommendations are generally made when clients seek the income protection features offered by the insurance company. Certain annuity payments are subject to the claims paying ability of the issuing company. You will be provided a prospectus of any annuity contract we recommend and you should study it carefully. We do not place your funds in annuities without your specific consent, but we could manage the funds within the annuity contract on a discretionary basis.

Other Strategies: CRA will use certain other strategies from time to time based upon the needs of certain clients or upon a perceived opportunity in the investment marketplace.

Risk of Loss

There are always risks to investing. Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear. It is impossible to name all possible types of risks. Among the risks are the following:

- Political Risks: Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- General Market Risks: Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could

go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.

- **Currency Risk:** Companies face currency risk when they do business in other countries. From time to time we invest in companies that are domiciled in other countries and their results can also be impacted by currency fluctuations. Some of the mutual funds we invest in may own foreign currencies and may invest in foreign securities or other similar instruments.
- **Regulatory Risk:** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure, tariffs, environmental regulations or other laws can impact the return on these investments.
- **Tax Risks Related to Short-Term Trading:** Clients should note that CRA may engage in short-term trading transactions. These transactions may result in short-term gains or losses for federal and state tax purposes. In some types of accounts short term gains may be taxed at higher rates than long-term gains. CRA endeavors to invest client assets in a tax efficient manner but does not consider each client's individual holding period when deciding to sell a particular security. CRA may consider tax implications of certain decisions in certain taxable accounts and clients should understand that adding tax considerations to the decision-making process can result in higher risk and/or lower returns. If a client requires special handling of any security, they should consult their tax professional and notify CRA of their wishes.
- **Purchasing Power Risk:** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk:** This can be thought of as certainty or uncertainty of a company's income. Management comes under business risk. Whether it's the uncertainty of the business cycle, the ebb and flow of product preferences, cost of labor and materials, or global health conditions, almost all investments are exposed to business risk.
- **Financial Risk:** The amount of debt or leverage a company has relative to its assets determines the financial risk of a company. Financial risk also applies to bonds issued by various governments and associated entities.
- **Default Risk:** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. However, these ratings do not always accurately identify the potential for a company to default on its debt.
- **Information Risk:** Most investment professionals rely on research in order to make conclusions about investment options. We use a variety of information procured from public and private sources to make investment decisions. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research can translate to a compromised ability for us to make satisfactory investment decisions.
- **Concentration Risk:** While CRA selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client's equity portfolio may be concentrated to some degree in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.

- Transition Risk: As assets are transitioned from a client’s prior advisers to CRA there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by CRA. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of CRA may adversely affect the client's account values, as CRA’s recommendations may not be able to be fully implemented.
- Restriction Risk: Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.
- Risks Related to Investment Term & Liquidity: Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.
- REITs: CRA may recommend that portions of client portfolios be allocated to real estate investment trusts, otherwise known as “REITs”. A REIT is an entity, typically a trust or corporation that accepts investments from a number of investors, pools the money, and then uses that money to invest in real estate through either actual property purchases or mortgage loans. While there are some benefits to owning REITs, which include potential tax benefits, income and the relatively low barrier to invest in real estate as compared to directly investing in real estate, REITs also have some increased risks as compared to more traditional investments such as stocks, bonds, and mutual funds. First, real estate investing can be volatile. Second, the specific REIT chosen may have a focus such as commercial real estate or real estate in a given location. Such investment focus can be beneficial if the properties are successful but lose significant principal if the properties are not successful. REITs may also employ significant leverage for the purpose of purchasing more investments with fewer investment dollars, which can enhance returns but also enhances the risk of loss. The success of a REIT is highly dependent upon the manager of the REIT. Clients should ensure they understand the role of the REIT in their portfolio. CRA limits its investments in REITs to publicly traded securities.
- MLPs: CRA may recommend that portions of client portfolios be allocated to master limited partnerships, otherwise known as “MLPs”. An MLP is a publicly traded entity that is designed to provide tax benefits for the investor. In order to preserve these benefits, the MLP must derive most, if not all, of its income from real estate, natural resources and commodities. While MLPs may add diversification and tax favored treatment to a client’s portfolio, they also carry significant risks beyond more traditional investments such as stocks, bonds and mutual funds. One such risk is management risk-the success of the MLP is dependent upon the manager’s experience and judgment in selecting investments for the MLP. Another risk is the governance structure, which means the rules under which the entity is run. The investors are the limited partners of the MLP, with an affiliate of the manager typically the general partner. This means the manager has all of the control in running the entity, as opposed to an equity investment where shareholders vote on such matters as board composition.

There is also a significant amount of risk with the underlying real estate, resources or commodities investments. Clients should ask CRA any questions regarding the role of MLPs in their portfolio.

- International Investing: Investing outside of the United States, especially in emerging markets, can have special or enhanced risks. The most obvious are political risk (changes in local politics can have a vast impact on the markets in that country as well as regulations affecting given issuers) and currency risk (changes in exchange rates between the dollar and the local denominations can materially affect the value of the security even if the underlying fundamentals and market price are stagnant). There are other risks, including enhanced liquidity risk, meaning that while domestic equities and mutual funds are generally easily liquidated (though there may be a risk of loss due to the timing of the sale), equities in other jurisdictions may be subject to the circumstances of lower overall market volume and fewer companies on an emerging exchange. In addition, there may be less information and less transparency in a foreign market or from a foreign company. Foreign markets impose different rules than domestic markets, which may not be to an investor's advantage. Also, companies in foreign jurisdictions are generally able to avail themselves of local laws and venues, meaning that legal remedies for U.S. investors may not be as easily obtained as in the U.S.

ITEM 9: DISCIPLINARY INFORMATION

There are no disciplinary items to report.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. Broker-dealer

To permit CRA clients to have access to as many investment solutions as possible, certain professionals of CRA are registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a FINRA member broker-dealer. The relationship with PKS allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with CRA or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to CRA.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with CRA. CRA attempts to mitigate this conflict by requiring that all investment

recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

B. Futures Commission Merchant/Commodity Trading Advisor

Neither the principal of CRA, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

Certain professionals of CRA are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for CRA clients, in their capacity as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his or her capacity as employees of CRA. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage CRA or utilize these professionals to implement any insurance recommendations. CRA attempts to mitigate this conflict of interest by disclosing the conflict to clients and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with CRA, or to determine not to purchase the insurance product at all. CRA also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of CRA, which requires that employees put the interests of clients ahead of their own.

D. Recommendations of other Advisers

This item is not applicable.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

B. CRA does not recommend to clients that they invest in any security in which CRA or any principal thereof has any proprietary or controlling financial interest.

C. On occasion, an employee of CRA may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a

trade before a client which could benefit the employee, all employee trades are reviewed by Compliance. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

ITEM 12: BROKERAGE PRACTICES

A. Recommendation of Broker-Dealer

CRA does not generally maintain custody of client assets; though CRA may be deemed to have custody if a client grants CRA authority to debit fees directly from their account (see Item 15 below). Assets will be held with a qualified custodian, which is typically a bank or broker-dealer. CRA recommends that investment accounts be held in custody by Schwab Advisor Services (“Schwab”), which is a qualified custodian. CRA is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when CRA instructs them to, which CRA does in accordance with its agreement with you. While CRA recommends that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Even though your account is maintained at Schwab, we may use other brokers to execute trades for your account as described below (see “Your Brokerage and custody costs”).

How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including both quantitative (Ex: costs) and qualitative (execution, reputation, service) factors. We do not consider whether Schwab or any other broker-dealer/custodian, refers clients to CRA as part of our evaluation of these broker-dealers.

Your brokerage and custody costs

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a

different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

Products and services available to us from Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like CRA. They provide CRA and our clients with access to its institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help CRA manage or administer our clients’ accounts, while others help CRA manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to CRA. Following is a more detailed description of Schwab’s support services:

Services that benefit you

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you.

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients’ accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession

- Access to employee benefits providers, human capital consultants, and insurance providers
- Assistance related to the transition of client assets from prior firms

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel. The services provided are based on our commitment to maintain at least \$82 Million in assets in custody with Schwab.

Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. We may have an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

We do not consider whether Schwab or any other broker-dealer/custodian, refers clients to CRA as part of our evaluation of these broker-dealers.

B. Aggregating Trades

An "aggregated trade", otherwise known as a "batch" or "block" trade is when all clients in whose accounts the trade is to be made are executed at the same time. Instead of placing a number of trades for the same security for each account, we will, when appropriate, executed one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except where doing so would create an unintended adverse consequence (For example, if a *pro rata* division would result in a client receiving a fraction of a share,) In some instances, the commission costs can be lower when trades are aggregated. This is not part of our arrangement with Schwab as of the date of this brochure.

ITEM 13: REVIEW OF ACCOUNTS

All accounts and corresponding financial plans will be managed on an ongoing and continuous basis by a member of senior management, but formal reviews with the client generally occur annually or upon request.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

- A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.

Please refer to Item 12, where we discuss recommendation of Broker-Dealers.

- B. Compensation to Non-Advisory Personnel for Client Referrals.

CRA does not directly or indirectly compensate any person who is not advisory personnel for client referrals. CRA may, at its discretion, provide gifts of nominal value for introducing prospective clients to the firm.

ITEM 15: CUSTODY

CRA deducts fees from client accounts but would not have custody of client funds otherwise. Clients will receive statements directly from Schwab, and copies of all trade confirmations directly from Schwab.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. Each quarter, the client will receive a statement from their account custodian showing all transactions in their account, including the fee.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on reports prepared by CRA against the information in the statements provided directly from Schwab. Please alert us of any discrepancies.

ITEM 16: INVESTMENT DISCRETION

When CRA is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to reasonably ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may at any time place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type. You may receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive monthly or quarterly statements from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as a Financial Services and Advisory Agreement that outlines the responsibilities of both the client and CRA.

ITEM 17: VOTING CLIENT SECURITIES

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. CRA will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. CRA will not give clients advice on how to vote proxies.

ITEM 18: FINANCIAL INFORMATION

CRA does not require the prepayment of fees more than six (6) months or more in advance and therefore has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.

ITEM 1: COVER SHEET

FORM ADV PART 2B • BROCHURE SUPPLEMENT

Ryan P. Drake

COMMONWEALTH RETIREMENT INVESTMENTS LLC
d/b/a



COMMONWEALTH
RETIREMENT
ADVISORS

Financial Planning • Asset Management • Retirement Income

9030 Stony Point Parkway, Suite 580 Richmond, VA 23235
804-282-1238 www.cwealthra.com

Version March 30, 2020

This Brochure Supplement provides information about Ryan P. Drake that supplements the Commonwealth Retirement Advisors Brochure. You should have received a copy of that Brochure. Please contact us at 804-282-1238 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about Ryan P. Drake is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Ryan P. Drake

Born: 1980

EDUCATION:

Bachelor of Business Administration, James Madison University, 2002

BUSINESS EXPERIENCE:

Commonwealth Retirement Advisors
Managing Member, 01/2017 – present

Commonwealth Retirement Advisors, LLC
Managing Member, 01/2012 – present

Purshe Kaplan Sterling Investments
Registered Representative, 01/2017 – present

Lincoln Financial Advisors
Registered Representative, 07/2001 – 01/2017

PROFESSIONAL DESIGNATIONS:

Certified Financial Planner

*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, 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.

Chartered Financial Consultant

The ChFC® designation has been a mark of excellence for almost thirty years and currently requires nine college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

CRPC Chartered Retirement Planning Counselor

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.

Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Drake.

Item 4: Other Business Activities

Mr. Drake is a registered representative of Purshe Kaplan Sterling Investments, Inc. (“PKS”). Commonwealth Retirement Advisors (“CRA”) is not affiliated with PKS other than as a registered representative. PKS is a registered broker-dealer and a FINRA member. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with CRA or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to CRA.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with CRA. CRA attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Mr. Drake is separately licensed as an independent insurance agent. As such, Mr. Drake may conduct insurance product transactions for CRA clients, in his capacity as a licensed insurance agent, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as an employee of CRA. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. Mr. Drake therefore has an incentive to recommend insurance products based on the compensation to be received, rather than on a client’s needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage CRA or utilize Mr. Drake to implement any insurance recommendations. CRA attempts to mitigate this conflict of interest by disclosing the conflict to clients and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with CRA, or to determine not to purchase the insurance product at all. CRA also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm’s Code of Ethics, their individual fiduciary duty to the clients of CRA, which requires that employees put the interests of clients ahead of their own.

Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Mr. Drake is supervised by the Chief Compliance Officer, Polly Cordle. Additionally, all employees of CRA are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where CRA is registered.

Item 7: State Requirements

A. Mr. Drake has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

B. Mr. Drake has not been the subject of a bankruptcy petition at anytime.

ITEM 1: COVER SHEET

FORM ADV PART 2B • BROCHURE SUPPLEMENT

James F. Drake

COMMONWEALTH RETIREMENT INVESTMENTS LLC
d/b/a



COMMONWEALTH
RETIREMENT
ADVISORS

Financial Planning • Asset Management • Retirement Income

9030 Stony Point Parkway, Suite 580 Richmond, VA 23235
804-282-1238 www.cwealthra.com

Version March 30, 2020

This Brochure Supplement provides information about James F. Drake that supplements the Commonwealth Retirement Advisors Brochure. You should have received a copy of that Brochure. Please contact us at 804-282-1238 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about James F. Drake is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

James F. Drake

Born: 1945

EDUCATION:

BS in Business Administration, University of Richmond, 1967

AA in Business Administration, Ferrum Junior College, 1965

BUSINESS EXPERIENCE:

Commonwealth Retirement Advisors
Investment Advisor Representative, 01/2017 – present

Commonwealth Retirement Advisors, LLC
Investment Advisor Representative, 03/2012 – present

Lincoln Financial Advisors
Registered Representative, 01/1983 – 01/2017

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Drake.

Item 4: Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any investment related outside business activity. Mr. Drake does not engage in any outside business activity.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Mr. Drake does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CRA.

Item 6: Supervision

Mr. Drake is supervised by the Chief Compliance Officer, Polly Cordle. Additionally, all employees of CRA are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where CRA is registered.

Item 7: State Requirements

A. Mr. Drake has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

B. Mr. Drake has not been the subject of a bankruptcy petition at anytime.

ITEM 1: COVER SHEET

FORM ADV PART 2B • BROCHURE SUPPLEMENT

David L. Monday

COMMONWEALTH RETIREMENT INVESTMENTS LLC
d/b/a



COMMONWEALTH
RETIREMENT
ADVISORS

Financial Planning • Asset Management • Retirement Income

9030 Stony Point Parkway, Suite 580 Richmond, VA 23235
804-282-1238 www.cwealthra.com

Version March 30, 2020

This Brochure Supplement provides information about David L. Monday that supplements the Commonwealth Retirement Advisors Brochure. You should have received a copy of that Brochure. Please contact us at 804-282-1238 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about David L. Monday is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

David L. Monday

Born: 1955

EDUCATION:

BS in Biology, Virginia Commonwealth University, 1976

MS in Gerontology, Virginia Commonwealth University – School of Allied Health Professions, 2012

Certificate of Completion – Executive Program, University of Virginia – Darden School of Business, 1992

BUSINESS EXPERIENCE:

Commonwealth Retirement Advisors
Chairman, 01/2017 – present

Commonwealth Retirement Investments,
LLC Chairman, 01/2012 – present

Lincoln Financial Advisors
Financial Advisor, 01/2012 – 01/2017

Inchwise, Inc.
Speaker, 01/2010 – 01/2013

Wells Fargo Advisors, LLC
Executive, 10/1980 – 09/2011

PROFESSIONAL DESIGNATIONS:

CRPC Chartered Retirement Planning Counselor

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Monday.

Item 4: Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any investment related outside business activity. Mr. Monday does not engage in any outside business activity.

Item 5: Additional Compensation

Other than regular or annual bonuses, Mr. Monday does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CRA.

Item 6: Supervision

Mr. Monday is supervised by the Chief Compliance Officer, Polly Cordle. Additionally, all employees of CRA are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where CRA is registered.

Item 6: Supervision

- A. Mr. Monday has not been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;

c) theft, embezzlement, or other wrongful taking of property;

d) bribery, forgery, counterfeiting, or extortion; or

e) dishonest, unfair, or unethical practices.

B. Mr. Monday has not been the subject of a bankruptcy petition at anytime.

ITEM 1: COVER SHEET

FORM ADV PART 2B • BROCHURE SUPPLEMENT

Kimberly W. Hicks

COMMONWEALTH RETIREMENT INVESTMENTS LLC
d/b/a



COMMONWEALTH
RETIREMENT
ADVISORS

Financial Planning • Asset Management • Retirement Income

9030 Stony Point Parkway, Suite 580 Richmond, VA 23235
804-282-1238 www.cwealthra.com

Version March 30, 2020

This Brochure Supplement provides information about Kimberly W. Hicks that supplements the Commonwealth Retirement Advisors Brochure. You should have received a copy of that Brochure. Please contact us at 804-282-1238 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about Kimberly W. Hicks is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Kimberly W. Hicks
Born: 1967

EDUCATION:

Bachelor of Arts in Communication, Randolph Macon Woman's College, 1990

BUSINESS EXPERIENCE:

Commonwealth Retirement Advisors
Investment Advisor Representative, 01/2017 – present

Commonwealth Retirement Advisors, LLC
Investment Advisor Representative, 03/2014 – present

Purshe Kaplan Sterling Investments
Registered Representative, 01/2017 – present

Lincoln Financial Advisors
Registered Representative, 07/2014 – 01/2017

Morgan Stanley
Senior Service Associate, 09/2012 – 03/2014

Merrill Lynch
Client Associate, 03/2010 – 09/2012

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Ms. Hicks.

Item 4: Other Business Activities

Ms. Hicks is a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). Commonwealth Retirement Advisors ("CRA") is not affiliated with PKS other than as a registered representative. PKS is a registered broker-dealer and a FINRA member. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with CRA or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to

receive customary commissions for the sales of various securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to CRA.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with CRA. CRA attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Ms. Hicks is supervised by the Chief Compliance Officer, Polly Cordle. Additionally, all employees of CRA are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where CRA is registered.

Item 7: State Requirements

A. Ms. Hicks has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

B. Ms. Hicks has not been the subject of a bankruptcy petition at anytime.

ITEM 1: COVER SHEET

FORM ADV PART 2B • BROCHURE SUPPLEMENT

Christopher S. Lee

COMMONWEALTH RETIREMENT INVESTMENTS LLC
d/b/a



COMMONWEALTH
RETIREMENT
ADVISORS

Financial Planning • Asset Management • Retirement Income

9030 Stony Point Parkway, Suite 580 Richmond, VA 23235
804-282-1238 www.cwealthra.com

Version March 30, 2020

This Brochure Supplement provides information about Christopher S. Lee that supplements the Commonwealth Retirement Advisors Brochure. You should have received a copy of that Brochure. Please contact us at 804-282-1238 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about Christopher S. Lee is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Christopher S. Lee

Born: 1992

EDUCATION:

Bachelor of Science in Business, concentration in Finance, Virginia Commonwealth University, 2014

BUSINESS EXPERIENCE:

Commonwealth Retirement Advisors
Investment Advisor Representative, Managing Member, 01/2017 – present

Commonwealth Retirement Advisors, LLC
Analyst, 10/2012 – present

Lincoln Financial Advisors
Registered Representative, 09/2014 – 01/2017

Turning Technologies
Intern, 08/2012 – 10/2012

SunTrust
Teller, 03/2012 – 08/2012

PROFESSIONAL DESIGNATIONS:

Certified Financial Planner

*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 two 3-hour sessions over the course of one day, 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.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Lee.

Item 4: Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any investment related outside business activity. Mr. Lee does not engage in any outside business activity.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Mr. Lee does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CRA.

Item 6: Supervision

Mr. Lee is supervised by the Chief Compliance Officer, Polly Cordle. Additionally, all employees of CRA are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where CRA is registered.

Item 7: State Requirements

A. Mr. Lee has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

B. Mr. Lee has not been the subject of a bankruptcy petition at anytime.



COMMONWEALTH RETIREMENT ADVISORS

Financial Planning • Asset Management • Retirement Income

PRIVACY NOTICE

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

INFORMATION WE COLLECT

COMMONWEALTH RETIREMENT INVESTMENTS D/B/A COMMONWEALTH RETIREMENT ADVISORS must collect certain personally identifiable financial information about its clients to ensure that it offers the highest quality financial services and products. The personally identifiable financial information which we gather during the normal course of doing business with you may include:

1. information we receive from you on applications or other forms;
2. information about your transactions with us, our affiliates, or others;
3. information collected through an Internet "cookie" (an information collecting device from a web server); and
4. information we receive from a consumer reporting agency.

INFORMATION WE DISCLOSE

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. We do not disclose your personal information to any third party for the purpose of allowing that party to market other products to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

CONFIDENTIALITY AND SECURITY

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.