

Capital Achievements, LLC

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January 24, 2020

This Brochure provides information about the qualifications and business practices of Capital Achievements, LLC (“Capital Achievements”, “us”, “we”, “our”). If you have any questions about the contents of this Brochure, please contact us at (512) 399-3541 or via email at doug@capitalachievements.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.

Additional information about Capital Achievements is also available via the SEC’s website www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for Capital Achievements is 291108. The SEC’s web site also provides information about any persons affiliated with Capital Achievements who are registered, or are required to be registered, as Investment Adviser Representatives of Capital Achievements.

Capital Achievements is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

Item 2 – Material Changes

Since our last filing on May 2, 2019, we have made the following material changes to our ADV Part 2A:

- We have update Item 4 to more accurately describe the services we provide; and
- We have updated Item 11 to indicate that we do not perform block trades.

In the future, this section of the Brochure will discuss only the specific material changes that were made to the Brochure and will provide you with a summary of all material changes that have occurred since the last filing of this Brochure. This section will also identify the date of our last annual Brochure update.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year end which is December 31st. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete brochure. Currently, our Brochure may be requested at any time, without charge, by contacting Ross Douglas Pauley at (512) 399-3541 or via email at doug@capitalachievements.com.

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Item 4 – Advisory Business Introduction

Our Advisory Business

Capital Achievements is a registered investment adviser. The Adviser was founded in 2017 by Ross (“R.”) Douglas Pauley after 21 years with another firm. He is the Adviser’s principal owner and serves as Managing Member and Chief Compliance Officer.

Services

Active Asset Management

Capital Achievements offers the following asset management services:

Capital Management Service

This service includes:

- Financial goal planning and tracking
- Debt management
- Cash flow planning
- Employee benefits reviews and recommendations
- Retirement account planning and recommendations
- Insurance needs analysis and recommendations
- Tax strategy planning and integration with portfolio management (Note: Since the Adviser is not a Tax Attorney, Certified Public Accountant or Enrolled Agent, the firm cannot offer accounting or specific tax advice. The tax strategy planning is intended to identify planning opportunities. Any suggestions made should be discussed with a tax advisor prior to implementation.)
- Estate plan integration (Note: Since the Adviser is not an attorney and cannot offer legal advice or prepare legal documents, the estate planning is intended to help identify gaps and/or planning opportunities as well as integrating your estate plan into your financial plan. Any suggestions made should be discussed with an attorney prior to implementation.)
- Investment planning
- Portfolio volatility tolerance determination
- Asset allocation
- Specific investment recommendations
- Rebalancing recommendations

- Implementation and plan maintenance support
- Ongoing access to the Adviser for the planning areas delineated above in this section.
- Account establishment and/or account transfer assistance
- Ongoing portfolio monitoring
- Asset allocation and transaction recommendations
- Online reporting
- Coordination with Client's other advisers

Investment services are provided on a non-discretionary basis and discretionary basis. Discretion is agreed upon at inception of the client relationship. For non-discretionary accounts, no transactions will be made without the Client's prior approval.

As part of the active asset management process, we will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

Based on the information you share with us, we will analyze your situation and tailor a portfolio with appropriate asset allocations and investment strategy[ies]. Our recommendations and ongoing management are based upon your investment goals, objectives and risk tolerance. We will monitor the account, trade as necessary, and communicate regularly with you.

We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account.

* Please note that pursuant to the investment advisory agreement you are obligated to notify us promptly when your financial situation, goals, objectives, or needs change. *

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Terms of Service

The Client agrees to furnish all information required by the Adviser to perform the agreed upon services. This entails not only the information required for the initial plans but changes to that information as it occurs so the Adviser can ensure the timely update and integration of the Client's Financial Plan and Investment Plan. Without being advised of changes in the Client's situation, the Adviser will be unable to fulfill the services as agreed upon.

All analyses and recommendations will be on a “best effort” basis, based upon the information submitted by the Client or the Client’s advisors. The Client may either follow or disregard wholly or partially any information, recommendation, or advice given by the Adviser.

Assets Under Management

As of December 31, 2019, we have \$70,877,670 in assets under management.

Item 5 – Fees and Compensation

Asset Management Fee Schedule

Capital Achievements does not impose a minimum account balance for the opening of an account with the Adviser. The fee we charge is for the Capital Management Service we provide, which includes financial planning, as detailed above in Item 4.¹ The fee charged is based upon the amount of money invested. Multiple accounts of immediately-related family members, at the same mailing address, may be considered one consolidated account for billing purposes. Fees are charged quarterly, in arrears. Payments are due and will be assessed within the first week of each quarter, based on the previous quarter ending balance of the account(s) under management for the preceding quarter. The Adviser will not pro rate for deposits and withdrawals in the account during the billing period. Fees will be calculated as follows:

Tiered fee Schedule

AUM	Fee	Equivalent Annual Rate
Up to \$1,000,000	0.2500%	1.00%
\$1,000,000 through \$3,000,000	0.1875%	0.75%
\$3,000,000 through \$5,000,000	0.1250%	0.50%
\$5,000,000 bill and over billed at	0.0625%	0.25%

Example Fee Calculation

$$\text{First \$\#} \quad \times \quad \%/4 \quad = \quad \text{\#\#}$$

¹ We will not charge a separate fee for financial planning services, unless we refer you to a third-party manager for asset management. See, the “Third Party Money Managers” and “Financial Planning Fees” sections below.

$$\begin{array}{r}
 \text{Next \$\#} \quad \times \quad \%/4 \quad = \quad \text{\#\#} \\
 + \quad \text{Next \$\#} \quad \times \quad \%/4 \quad = \quad \text{\#\#} \\
 \hline
 \text{Total Fee} \quad \quad \quad = \quad \text{\#\#}
 \end{array}$$

There is a minimum term for the advisory agreement of four quarters.

No increase in the fee shall be effective without prior written notification. Capital Achievements believes the advisory fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

The Client acknowledges and agrees that the Adviser may charge for certain additional Assets managed for the Client by the Adviser, but not held by the Custodian (i.e., annuities, mutual funds, 401(k), 403(b), 457, ETFs and life insurance cash values).

Automatic Payment of Fee

The Client agrees to authorize the Custodian to pay directly to Capital Achievements upon receipt of notice, the Account's investment advisory services fee. Fee withdrawals will occur no more frequently than quarterly from the Client's Account, unless specifically instructed otherwise by the Client.

The Custodian will send to the Client a statement, at least quarterly, indicating all amounts disbursed from the Account, including the fee paid directly to Capital Achievements. Capital Achievements' access to the Assets of the Account will be limited to trading and the withdrawals authorized above. Additionally, Capital Achievements will provide to the Client an invoice reflecting the amount of the fee, the previous quarter ending balance for the Client's Account on which the fee was based, and the specific manner in which the fee was calculated.

Third-Party Fees

Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, and other fund expenses. Certain strategies offered by us may involve investment in mutual funds and/or ETFs. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge. Our brokerage practices are discussed in more detail under Item 12 – Brokerage Practices.

Financial Planning/Consulting Fees

The Adviser charges \$300/hour for Financial Planning/Consulting outside the scope of the Capital Management Service (CMS) the Adviser provides.

All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations.

Item 6 – Performance Based Fee and Side by Side Management

We do not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Client(s)

We provide investment advisory services to individuals and their families.

We have no minimum account opening balance.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Asset Allocation. Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, alternative investments, and cash suitable to your investment goals and risk tolerance.

A risk of asset allocation is that you may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, alternative investments, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for your goals.

Mutual Fund and/or ETF Analysis. A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a

manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for your portfolio.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

Our advice generally includes recommendations regarding the following securities:

- Exchange-listed securities
- Certificates of deposit
- Municipal securities
- Mutual fund shares
- Exchange-traded funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be recommended when consistent with your stated investment objectives, tolerance for risk, liquidity and suitability.

We use the following strategy in managing your account(s), provided that such strategy is appropriate to your needs and consistent with your investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them in your account for a year or longer. Typically, we employ this strategy when we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains. Moreover, a security may decline sharply in value before we make the decision to sell. You are reminded that investing in any security entails risk of loss you must be willing to bear.

Item 9 – 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 us or the integrity of our management. We do not have any information to disclose concerning Capital Achievements or any of our IARs. We adhere to high ethical standards for all IARs and associates.

Item 10 – Other Financial Industry Activities and Affiliations

Neither Capital Achievements nor any of its management persons are registered as a broker-dealer or registered as a representative of a broker-dealer, nor does it have any pending application to register. In addition, neither Capital Achievements nor its management persons are affiliated with any broker-dealer.

Capital Achievements and its management persons are not registering as a commodity pool operator, futures commission merchant, or commodity trading adviser.

Other Financial Industry Affiliations

The IARs of Capital Achievements do not participate in other business activities or have any outside affiliations at this time.

Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

General Information

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

Participation or Interest in Client Accounts

Our Compliance policies and procedures prohibit anyone associated with Capital Achievements from having an interest in a client account or participating in the profits of a client's account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the CCO.

Personal Trading

We may recommend securities to you that we will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Capital Achievements has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons". The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Adviser selects; provided, however that at any time that the Adviser has only one Access Person, he or she shall not be required to submit any securities report described above.

We have established the following restrictions in order to ensure our fiduciary responsibilities regarding insider trading are met:

No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of IARs of Capital Achievements, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

Privacy Statement

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

Conflicts of Interest

Capital Achievements' IARs may employ the same strategy for their personal investment accounts as it does for its clients. However, IARs may not place their orders in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

Item 12 – Brokerage Practices

Soft Dollars

Capital Achievements has elected to use a single custodian with which to serve clients, TD Ameritrade Institutional. Our decision is based on analysis of TD Ameritrade's discounted commission structure, the availability of mutual funds with no transaction fee, ETFs, trading platforms, electronic reporting, online access for our clients, and financial stability. Not all investment advisers require their clients to open their accounts with a specific custodian. Our choice of one custodian through which we execute our trades may affect our ability to achieve the most favorable execution of your transactions, potentially increasing costs. In recommending TD Ameritrade as custodian and as the securities brokerage firm responsible for executing transactions for your portfolios, we consider at a minimum their:

- existing relationship with us,
- financial strength,
- reputation,
- reporting capabilities,
- execution capabilities,
- pricing, and
- types and quality of research.

The determining factor in the selection of a broker-dealer/custodian to execute transactions for your accounts is not the lowest possible transaction cost, but whether they can provide what is in our view the best qualitative execution for your account.

We participate in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers services to independent investment advisers which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through our participation in the program.

We participate in TD Ameritrade's Institutional customer program and we recommend TD Ameritrade to our clients for custody and brokerage services. There is no direct link between our firm's participation in the program and the investment advice we give to our clients. Along with you, we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors.

These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services;

access to a trading desk serving adviser participants; the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds and Exchange Traded Funds with no transaction fees and to certain Institutional money managers; and discounts on compliance, marketing, research, and technology.

Some of the products and services made available by TD Ameritrade through the program may benefit us but may not benefit our client accounts. These products or services may assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. The benefits we receive through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that our receipt of economic benefits creates a potential conflict of interest and may indirectly influence our recommendation of TD Ameritrade for custody and brokerage services. Capital Achievements may encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade.

TD Ameritrade is a discount broker-dealer independent of an unaffiliated with Adviser and there is no employee or agency relationship between TD Ameritrade and Capital Achievements.

Capital Achievements receipt of these benefits does not diminish our duty to act in the best interests of our clients, including seeking best execution of trades for client accounts.

As a matter of policy and practice, Capital Achievements does not generally block client trades and, therefore, we implement client transactions separately for each account. Consequently, certain client trades may be executed before others, at a different price. Additionally, our clients may not receive volume discounts available to advisers who block client trades. Many investment advisers do aggregate, or block trades for you.

Brokerage for Client Referrals

In selecting and/or recommending broker-dealers, we do not take into consideration whether or not we will receive client referrals from the broker-dealer or third party.

Directed Brokerage

By directing you to a third-party manager, you may pay higher fees or transaction costs than those obtainable by other broker-dealers. In most cases, we believe you are paying a discounted and reasonable rate. You may pay higher or lower fees if you select another broker-dealer.

Item 13 – Review of Accounts

Reviews

While the underlying securities within all of our Capital Management Service client accounts are monitored on an ongoing basis, client accounts are reviewed at least annually or as agreed to by us. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, the market, and the political or economic environment. Additionally, we are happy to

review the client's portfolio at any time upon his/her request. These accounts are reviewed by: R. Douglas Pauley.

Investment advice and asset management services may be provided by a third-party money manager; please consult the third-party money manager's Form ADV Part 2A for further information regarding reviews of client investment advisory accounts.

Reports

As a portfolio management services client, you will receive written or electronic monthly statements and confirmations of transactions from your custodian/broker-dealer.

In addition to the reports you will receive from the custodian, we provide supplemental reporting electronically.

Item 14 – Client Referrals and Other Compensation

We do not receive any economic benefit from someone who is not a client for providing investment advice or other advisory services to our clients nor do we directly or indirectly pay any compensation to another person if they refer clients to us.

Item 15 – Custody

An investment advisory firm has custody of client funds or securities when it has the authority to access either. We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts, giving us a nominal form of custody of our clients' funds. As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Clients also may provide login information directly linking other accounts to their financial plan (which they may access directly via their MoneyGuidePro login) or via their client portal to our portfolio accounting system (ndex Systems).

Standing Letter of Authorization

Capital Achievements is deemed to have custody of client funds or securities as a result of maintaining standing letters of authorization (SLOA) for the purpose of distributing funds from a client's account. For those accounts in which we have the ability to initiate distributions from a client's account, via journal, ACH or wire to a third-party, which is an account held in the name of someone other than the client, we will ensure the following conditions have been met in order for us to be in compliance with SEC and State Custody Rules and ensure the safe keeping of our client's funds:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third-party's name, and either the third-party's address or the third-party's account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third-party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. The investment adviser has no authority or ability to designate or change the identity of the third-party, the address, or any other information about the third-party contained in the client's instruction.
6. The investment adviser maintains records showing that the third-party is not a related party of the investment adviser or located at the same address as the investment adviser.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16 – Investment Discretion

We manage assets on a discretionary and/or a non-discretionary basis. If you provide discretion authority, which will be evidenced via the written, discretionary agreement between the client and the Adviser, we will have the authority to determine the following without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account

In all cases this discretion is exercised in a manner consistent with our agreed upon investment strategy for your account and in accordance with any restrictions placed on the account(s).

When active asset management services are provided on a discretionary or non-discretionary basis, the client will enter into a separate custodial agreement with the custodian. In either case, the custodian agreement will include a limited power of attorney to trade in the client's account(s) which authorizes the custodian to take instructions from us regarding all investment decisions for your account.

If you do not give us the authority to manage your account on a discretionary basis, which will be evidenced via the written, non-discretionary agreement between the client and the Adviser, then we will not buy or sell any security in your account without your prior, express permission. Please be advised that

this could adversely affect the Adviser's ability to take advantage of price swings when attempting to purchase or sell securities in the client's account, especially in instances where the Adviser is not able to contact the client in a timely manner.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to you regarding your voting of proxies. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets.

Item 18 – Financial Information

We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

Item 19 – Requirements for State Registered Advisers

Principals

There is one principal of Capital Achievements, R. Douglas Pauley. He is the Managing Member and CCO and was born in 1958. His education information, business background, and other business activities can be found in the Form ADV Part 2B Brochure Supplement below.

Performance Fees

We do not charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our normal asset management accounts.

Disclosable Events

Neither Capital Achievements nor R. Douglas Pauley has any reportable events to disclose here.

Other Relationships

Neither Capital Achievements nor R. Douglas Pauley has any relationship with any issuer of securities.

ADV Part 2B Brochure Supplement – Ross Douglas Pauley

Item 1 – Cover Page

Ross Douglas Pauley

CRD #: 4443719

**Capital Achievements, LLC
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www.capitalachievements.com
(512) 399-3541
January 24, 2020**

This Brochure supplement provides information about Ross (“R.”) Douglas Pauley and supplements the Capital Achievements (“Capital Achievements”) Brochure. You should have received a copy of that Brochure. Please contact R. Douglas Pauley if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about R. Douglas Pauley, 4443719 is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Full Legal Name: Ross Douglas Pauley

Year of Birth: 1958

Education

MBA, Finance 1988
Harvard Graduate School of Business Administration

BS, Economics 1981
United States Military Academy (USMA) at West Point

Designations

R. Douglas Pauley has earned the following designation(s) and is in good standing with the granting authority:

- CERTIFIED FINANCIAL PLANNER (“CFP”) Certificant; CERTIFIED FINANCIAL PLANNER Board of Standards, Inc.; 1991
- Accredited Investment Fiduciary (“AIF”); Center for Fiduciary Studies; 2005

Description of designation requirements:

CERTIFIED FINANCIAL PLANNER (CFP) designation:

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.

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;
- 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 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.

Accredited Investment Fiduciary designation:

- Complete Accredited Investment Fiduciary Training with course objectives of:
 - Articulate the basis for, and benefits of, fiduciary standards of excellence.
 - Identify when an individual or organization may be deemed to have fiduciary status.
 - Identify the legal standards that require fiduciaries to prudently manage investment decisions.
 - Apply the Practices that define a prudent investment process for Investment Stewards and Advisors and recognize the Practices for Investment Managers.
 - Strengthen own or clients’ fiduciary policies and procedures.
- Pass the course-ending exam with a score of 75% or better.
- Sign and agree to abide by a code of ethics.
- Complete six hours of continuing professional education annually, four of which are fi360 Training CE.

Business History

November 2017 – Present	Managing Member and CCO at Capital Achievements, LLC
April 1996 – December 2017	Managing Principal at Pauley Financial Services, Inc.
May 1981 – April 1996	Army Officer at United States Army

Item 3 – Disciplinary History

Neither Capital Achievements nor R. Douglas Pauley has any disciplinary history to disclose.

Item 4 – Other Business Activities

As noted in Item 10 “Other Financial Industry Activities and Affiliations” above, R. Douglas Pauley has no outside business activities and/or affiliations to disclose.

Item 5 – Additional Compensation

R. Douglas Pauley does not receive any other compensation.

Item 6 – Supervision

R. Douglas Pauley is the CCO and performs all supervisory duties for his firm.

Item 7 – Requirements for State-Registered Advisers

R. Douglas Pauley has no reportable events to disclose here.

PRIVACY POLICY NOTICE – CAPITAL ACHIEVEMENTS, LLC

Capital Achievements, LLC (“Capital Achievements”) adopted this policy with recognition that protecting the privacy and security of the nonpublic personal information we obtain about our clients is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain nonpublic personal information about you. We want you to know what information we collect and how we use and safeguard that information.

WHAT INFORMATION WE COLLECT

We collect certain nonpublic personal information about you (such as your name, address, social security number, etc.) that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

WHAT INFORMATION WE DISCLOSE

Capital Achievements does not disclose the nonpublic personal information we collect about our clients to anyone except: (1) in furtherance of our business relationship with clients, and then only to those persons necessary to effect the transactions and provide the services that clients authorize (such as broker-dealers, custodians, independent managers etc.); (2) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (3) our attorneys, accountants, and auditors; or (4) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited to use or share the information for any other purpose. If you decide to either terminate our services or become an inactive client, we will continue to adhere to our Privacy Policy, as may be amended from time to time.

We are required to report any suspected exploitation of vulnerable adult clients to the proper authorities under federal and state statutes.

SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

OPTING OUT

Clients cannot opt out of allowing Capital Achievements, LLC to share their nonpublic personal information with non-affiliated third parties which are necessary to service their accounts.

REQUESTS FOR INFORMATION

For a copy of our Privacy Policy, please contact the Chief Compliance Officer either in writing at 76 Twin Ridge Pkwy, Round Rock, TX 78664, doug@capitalachievements.com or phone/text at (512) 399-3541.