

This brochure supplement provides information about James Michael O'Donoghue that supplements the Compass Rose Investments, LLC d/b/a Compass Rose Private Investment Management brochure. You should have received a copy of that brochure. Please contact James Michael O'Donoghue if you did not receive Compass Rose Investments, LLC d/b/a Compass Rose Private Investment Management's brochure or if you have any questions about the contents of this supplement.

Additional information about James Michael O'Donoghue is also available on the SEC's website at www.adviserinfo.sec.gov.

**Compass Rose Investments, LLC d/b/a
Compass Rose Private Investment
Management**
Form ADV Part 2B – Individual Disclosure Brochure

for

James Michael O'Donoghue

Personal CRD Number: 3092644

Investment Adviser Representative

Compass Rose Investments, LLC d/b/a Compass Rose Private Investment Management
110 Chapel St.
Portsmouth, NH 03801
(603) 319-8211
jim@compassrosepim.com

UPDATED: 3/24/2022

Item 2: Educational Background and Business Experience

Name: James Michael O'Donoghue **Born:** 1953

Educational Background and Professional Designations:

Education:

Ph.D. Finance and Economics, New York University
Masters City Planning, Boston University
BA Government and Policy Analysis, University of Massachusetts, Amherst

Business Background:

06/2011 - Present	Partner Compass Rose Investments, LLC d/b/a Compass Rose Private Investment Management
06/2011 - 05/2017	Investment Adviser Representative/ Registered Representative Wells Fargo Advisors Financial Network, LLC
10/2003 - 06/2011	Vice President Wells Fargo Advisors

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

James Michael O'Donoghue is owner of RoxyJames Realty, LLC; a real estate business that holds title to the building that houses Compass Rose Investments, LLC d/b/a Compass Rose Private Investment Management. He receives no compensations from RoxyJames, LLC.

Item 5: Additional Compensation

James Michael O'Donoghue does not receive any economic benefit from any person, company, or organization, other than Compass Rose Investments, LLC d/b/a Compass Rose Private Investment Management in exchange for providing clients advisory services through Compass Rose Investments, LLC d/b/a Compass Rose Private Investment Management.

Item 6: Supervision

As a representative of Compass Rose Investments, LLC d/b/a Compass Rose Private Investment Management, James Michael O'Donoghue is supervised by Benjamin Beck, the firm's Chief Compliance Officer. Benjamin Beck is responsible for ensuring that James Michael O'Donoghue adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Benjamin Beck is (617) 209-2224.