

**Firm Brochure  
(Part 2A of Form ADV)**

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**This brochure provides information about the qualifications and business practices of Family CFO, Inc. If you have any questions about the contents of this brochure, please contact us at: 650-218-3551, or by email at: Raj Rajendran (rajfamilycfo@sbcglobal.net). 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. Registration does not imply a certain level of skill or training.**

**Additional information about Family CFO, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Family CFO, Inc. is 127335.**

**DATE**

## **Material Changes**

### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure and whenever there is a material change

### **Material Changes since the Last Update**

1. In future filings, this section of the Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the SEC’s public disclosure website (IAPD) [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).
2. We may, at any time, update this Brochure and either send you a copy or offer to send you a copy (either by electronic means (email) or in hard copy form).

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 650-218-3551 or by email at: Raj Rajendran ([rajfamilycfo@sbcglobal.net](mailto:rajfamilycfo@sbcglobal.net)).

Within 120 days of our fiscal year end we will deliver our annual Summary of Material Changes if there have been material changes since the last annual updating amendment. With this Summary, we also hereby offer to deliver an updated Investment Advisor Brochure upon your request at any time during the year. You may submit your request to: Raj Rajendran at (650)218-3551 or Raj Rajendran ([rajfamilycfo@sbcglobal.net](mailto:rajfamilycfo@sbcglobal.net)). .

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## **Advisory Business**

### **Firm Description**

Family CFO, Inc. was founded in 2004.

### **Services**

We provide personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with you and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

We are strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products.

The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

We accept discretionary authority to manage securities accounts on behalf of clients. We have the authority to determine, without obtaining your specific consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. We do not act as a custodian of client assets. You always maintain asset control. We place trades for you under a limited power of attorney.

A written evaluation of your initial situation is provided to you, often in the form of a net worth statement. Quarterly reviews are conducted for investment portfolio and communicated to you. Planning issues other than investment portfolios are conducted on an as needed basis.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by you on an as-needed basis. Conflicts of interest will be disclosed to you in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to you.

### **Principal Owners**

Raj Rajendran is the sole shareholder

### **Types of Advisory Services**

We provide investment supervisory services, also known as asset management services; manage investment advisory accounts not involving investment supervisory services and furnish investment advice through consultations.

Manage portfolio of assets:

- Emphasize asset allocation and diversification. This is key to long run success.
- Assess client's risk profile periodically and adjust the portfolio accordingly.
- Allocation between bonds and equities are established or changed with client's concurrence; however sub allocations within equity and within bonds are made without prior consultation with you.

- Once established, portfolio changes, in general will be minor. We not recommend “market timing”
- All the monies will be in client’s names.
- Invest mostly via low cost mutual funds.
- In general, do not recommend individual stocks.
- Based on client’s availability, will hold face-to-face meetings quarterly and review performance.

Perform tax planning and risk planning as required

Co-ordinate estate planning with estate planning attorney.

Emphasize low cost, tax efficiency, diversification and staying the course

On more than an occasional basis, we furnish advice to you on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

### **Financial Planning**

Depending on your needs and interests, we may provide advice in the form of a Financial Plan. The Financial Plan will assess the likelihood of you achieving various goals and objectives dependent on various personal and financial assumptions, including portfolio design, lifestyle, work and retirement plans, pursuit of charitable and/or family goals and normal savings and consumption behavior. Depending on your needs, the Plan may also address elements of tax and estate planning and insurance, including life, disability, health and long term care insurance.

### **Assets under Management**

As of December 31, 2010, we managed approximately \$43,800,000 in assets for approximately 25 clients on a discretionary basis

### **Tailored Relationships**

The goals and objectives for you are documented as a result of our discussions..

Our Agreement with you may not be assigned without your consent.

### **Types of Agreements**

The following agreements define the typical client relationships.

#### **Asset Management Agreement**

Assets are invested primarily in no-load and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages charge a transaction fee for the purchase and sale of funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. We do not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), and U. S. government securities.

The annual Asset Management Agreement fee is based on a percentage of the investable assets according to the following schedule:

1.00% on the first \$1,000,000;

0.80% on the next \$1,500,000; 0.60% on the assets above \$2,500,000; and

If assets are above \$5,000,000, fee is 0.6% on all of the assets.

### **Financial Planning Agreement**

Occasionally, we engage in a planning-only agreement.

A financial plan is designed to help you with all aspects of financial planning.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at your discretion.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$1,000 (the fee range is \$5,000 to \$10,000). Since financial planning is a discovery process, situations occur wherein you are unaware of certain financial exposures or predicaments.

In the event that your situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. You must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month. Follow-on implementation work is billed separately at the rate of \$350 per hour.

### **Hourly Planning Engagements**

Occasionally, we provide hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$350.

### **Termination of Agreement**

You may terminate any of the aforementioned agreements at any time by notifying us in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If you made an advance payment, we will refund any unearned portion of the advance payment.

We may terminate any of the aforementioned agreements at any time by notifying you in writing. If you made an advance payment, we will refund any unearned portion of the advance payment.

### **Fees and Compensation**

#### **Description**

We base our fees on a percentage of assets under management, hourly charges, and fixed fees (not including subscription fees).

Financial plans are priced according to the degree of complexity associated with your situation.



We, in our sole discretion, may waive our minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with you, etc.).

### **Fee Billing**

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from an account designated by you to facilitate billing. You must consent in advance to direct debiting of your investment account.

Fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan.

### **Other Fees**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

### **Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to us.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

### **Past due Accounts and Termination of Agreement**

We reserve the right to stop work on any account that is more than 30 days overdue. In addition, we reserve the right to terminate any financial planning engagement where you have willfully concealed or have refused to provide pertinent information about financial situations when necessary and appropriate, in our judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded.

## **Performance-Based Fees**

### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

## **Types of Clients**

### **Description**

We generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

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

### Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

### Investment Strategies

The primary investment strategy used on your accounts is strategic allocation amongst asset classes. Major asset classes used are equities and bonds. There are sub-asset classes within equity and within bond asset classes. Equity asset class is globally diversified across US domestic, International Developed and Emerging markets. Bonds are usually short to intermediate duration. The vehicles used are mutual funds and ETFs. We mostly use passively-managed funds. We also do use some actively-managed funds.

The allocation between equities and bonds for you is based upon the objectives stated by you during consultations. You may change these objectives at any time and accordingly the split between equities and bonds may be changed. Any allocation change between equities and bonds is made with your concurrence. However, changes within sub asset classes are communicated to you after the fact via quarterly reports.

We do not buy individual stocks or bonds in place of mutual funds or ETFs unless specifically requested by clients. We do sell and liquidate individual stocks and bonds transferred in by you, in consultation with you. In general, the investment portfolios are not concentrated but diversified, we do not employ market timing and do not employ leverage.

Other strategies may include long-term purchases, short-term purchases and trading,

### Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind.

Investors face the following investment risks:

Portfolios likely will have some small cap bias and value bias; such bias may generate higher returns, but for sure they increase the volatility risk.

**Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

**Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

**Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

**Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

**Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

**Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

**Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

**Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Disciplinary Information**

### **Legal and Disciplinary**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

### **California Disclosures**

The California Code of Regulations imposes two notice requirements upon financial advisers: (a.) lower cost comparable services may be available from others, and (b.) the possibility exists for a conflict of interest between your interests and ours. You are under no obligation to purchase advice or services from us.

## **Other Financial Industry Activities and Affiliations**

### **Financial Industry Activities**

We are not involved in any other financial industry activities.

### **Affiliations**

We have no arrangements that are material to our advisory business or you with any other entity.

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

### **Code of Ethics**

We have adopted a Code of Ethics. The Code sets forth our expectations of as respects standards of conduct, fiduciary duties, required compliance with all securities regulations, required reporting of personal trading, pre-approval of participation in any initial public offering or private placement, required reporting of violations of the Code to the Chief Compliance Officer, and required written

acknowledgement of receipt of the Code by personnel. A copy of the Code of Ethics is available to you and prospects upon request.

### **Participation or Interest in Client Transactions**

We and our employees may buy or sell securities that are also held by you. Employees may not trade their own securities ahead of your trades. Employees comply with the provisions of our Compliance Manual.

### **Personal Trading**

The Chief Compliance Officer is Raj Rajendran. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that you receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

## **Brokerage Practices**

### **Selecting Brokerage Firms**

The firm currently implements our investment management services through TD Ameritrade, Vanguard Group of companies, Dimensional Fund Advisors, American Funds and ETFs.

We do not have any affiliation with product sales firms. Specific custodian recommendations are made to you based on your need for such services. We recommend custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

We do not receive fees or commissions from any of these arrangements.

### **Best Execution**

We review the execution of trades at each custodian annually. The review is documented in our Compliance Manual. Trading fees charged by the custodians is also reviewed on an annual basis. We do not receive any portion of the trading fees.

### **Soft Dollars**

We do not receive any soft dollars.

### **Order Aggregation**

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

### **Trade Errors**

From time-to-time we may make an error in submitting a trade order on your behalf. When this occurs, we may place a correcting trade with the broker-dealer which has custody of your account. If an investment gain results from the correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we confer with you and you decide to forego the gain (e.g., due to tax reasons). Our policy is that you will not bear any loss resulting from errors committed by us or our third-party service providers.

## **Review of Accounts**

### **Periodic Reviews**

Account reviews are performed quarterly by Raj Rajendran. Account reviews are performed more frequently when market conditions dictate.

### **Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in your own situation.

### **Regular Reports**

Clients receive periodic communications each quarter.

## **Client Referrals and Other Compensation**

### **Incoming Referrals**

We have been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

### **Referral Fees Paid**

We do not compensate any one for client referrals.

### **Referrals Out**

We do not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## **Other Compensation**

We do not receive any commissions or referral fees for any recommendations we make to other professionals.

## **Custody**

### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to you at your address of record at least quarterly.

### **Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by us.

## Investment Discretion

### Discretionary Authority for Trading

We accept discretionary authority to manage securities accounts on your behalf. We have the authority to determine, without obtaining your specific consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

You approve the custodian to be used and the commission rates paid to the custodian. We do not receive any portion of the transaction fees or commissions paid by you to the custodian .

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment strategy that we have agreed upon.

### Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute trades.

## Voting Client Securities

### Proxy Votes

We do not vote proxies. Therefore, although we may provide investment advisory services relative to your investment assets, you maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by you shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to your investment assets. We and/or you shall correspondingly instruct each custodian of the assets to forward to you copies of all proxies and shareholder communications relating to your investment assets.

## Financial Information

### Financial Condition

We do not have any financial impairment that will preclude the firm from meeting contractual commitments to you.

A balance sheet is not required to be provided because we do not serve as a custodian for your funds or securities, and do not require prepayment of fees of more than \$600, and six months or more in advance.

## Business Continuity Plan

### General

We have a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

### Disasters

The Business Continuity Plan covers natural and manmade disasters.

Electronic files are backed up daily and archived offsite.

**Alternate Offices**

An alternate office has been identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact you within five days of a disaster that dictates moving our office to an alternate location.

**Loss of Key Personnel**

We have signed a Business Continuation Agreement with another financial advisory firm to support us in the event of Raj Rajendran's serious disability or death.

**Information Security Program****Information Security**

We maintain an information security program to reduce the risk that your personal and confidential information may be breached.

**Privacy Notice**

We are committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf. We also share such information with a third party that provides back office support to generate the portfolio reports. This relationship is governed by a confidentiality agreement.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information will be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

## Brochure Supplement (Part 2B of Form ADV)

### Education and Business Standards

Persons giving financial advice to clients are required to have a Certified Financial Planner (CFP) license, a Certified Public Accountant (CPA) license, Registered Financial Consultant (RFC) designation, Life Insurance license or State Registration in tax preparation.

### Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

**Certified Financial Planner (CFP):** Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

**Registered Financial Consultant ("RFC"):** This designation is issued by the International Association of Registered Financial Consultants (IARFC) and is granted to individuals who meet all of the following prerequisites:

- Undergraduate or graduate financial planning degree, or have earned one of the following designations: AAMS, AEP, CEP, CFA, CFP, ChFC, CLU, CPA, EA, LUTC, MS, MBA, JD, Ph.D, or completed a CFP equivalent, IARFC-approved college curriculum;
- Four years full-time experience as a financial planning practitioner.
- Completion of approved college curriculum in personal financial planning or IARFC self-study course;
- undergo Continuing Education in the form of Forty hours per year



**Raj Rajendran, CFP™, RFC**

Educational Background:

- \* Year of birth: 1950
- \* Institutions
  - Bachelor's degree in engineering from Indian Institute of Technologies (IIT), Chennai (1972)
  - Master's degree in Management Science from Imperial College, University of London, England (1975)

Business Experience:

- \* Family CFO, Inc.; President and Chief Compliance Officer; (2004 to present)  
Certus; cofounder and CFO; (2000 to 2004)  
Nortel Networks; Vice President of Finance; (1997 to 2000)

Other Business Activities: None

Additional Compensation: None

Supervision:

Raj Rajendran is the President and Chief Compliance Officer. As such, Raj Rajendran is responsible for all advice provided to clients.

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None