



Form ADV Part 2A Appendix 1 – Wrap Brochure

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This MyVest Advisors Disclosure Brochure provides information about the qualifications and business practices of MyVest Advisors. If you have any questions about the contents of this brochure, please contact MyVest Advisors at the telephone number or email address provided above. 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.

MyVest Advisors is an SEC Registered Investment Advisor (registration pending). Registration as an Investment Advisor does not imply a certain level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about MyVest Advisors is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Material Changes

This brochure was created to provide information concerning our Managed Portfolio Services “Wrap” Account Program (hereinafter referred to as the “MPS Program”). As this is a new brochure, there are no material changes to report. If there had been any material changes, they would be identified and discussed in this section.

Generally, MyVest Advisors will provide clients with a new brochure, or a description of material changes, as necessary based on amendments or new information. In addition, MyVest Advisors will offer clients a copy of our brochure at least annually.

Our brochure is available free of charge, upon request, at any time by contacting MyVest Advisors at 877-204-7557, or compliance@myvestadvisors.com. Our brochure is also available on our web site (www.myvestadvisors.com).

We urge you to carefully review this document in its entirety as it contains important information about our advisory services, fee structure, business practices, conflicts of interest and disciplinary history.

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Item 4 Services, Fees and Compensation

MyVest Advisors (hereinafter “MyVest”) is a registered investment advisor with the Securities and Exchange Commission with its principal place of business located in San Francisco, California and began conducting business in 2013. MyVest is a wholly-owned subsidiary of MyVest Corporation, which has been in business since 2001. For more information about MyVest Corporation please visit the company’s website www.myvest.com.

Services Offered, Fees and Compensation

MyVest specializes in providing personalized overlay portfolio management services (“OPM Services”) in conjunction with its sub-advisory relationships with third party registered investment managers (“Strategists” and “Model Managers” as defined below and hereinafter collectively referred to as the “Strategic Portfolio Network™” or “SPN”) for the benefit of clients of wealth management firms, broker/dealers, banks, and custodians (“Sponsors”). MyVest currently offers its OPM Services and Strategic Portfolio Network™ (when combined referred to as MyVest’s “Managed Portfolio Services Program” or “MPS Program”) to Sponsors who, through their employees or agents (“Advisors”), provide continuous and regular investment advisory services to their Clients (as defined below). The scope and nature of each MPS Program is jointly determined by MyVest and the Sponsor. Each MPS Program is designed to enhance the Sponsor’s ability to provide continuous, value-added investment advisory services to their Clients.

MyVest combines the services offered through the MPS Program with the use of MyVest Corporation’s technology (the “Strategic Portfolio System™” or “SPS”) to create a unique investment management platform for each Sponsor that enhances Client service and increases Advisor productivity. SPS allows Advisors to manage a Client’s total holdings across multiple accounts and registrations in a personalized, yet scalable manner. Advisors can manage “Households” that have taxable accounts (e.g., individual and joint accounts), tax-deferred accounts (e.g., individual retirement accounts (“IRAs”)), and other accounts (registered in the names of the children, a company, or a trust) as easily as managing one large account. This process is known as “Household Management” in SPS. A Household can be comprised of one or more “Strategic Portfolios,” each managed according to a Strategy and Personalizations (as defined below) designated by an Advisor in consultation with the Primary Client (as defined below). Each Strategic Portfolio can encompass one or more custody accounts that are typically (but not necessarily) owned by one or more members of a family, and which contain assets the account owners (each a “Client”) want to be managed as a whole (aka, a unified managed household (“UMH”)). At the inception of a Strategic Portfolio, the Clients

within the Household will sign a tri-party agreement (“Strategic Portfolio Agreement”) with MyVest and the Advisor in which the Clients assign limited discretionary authority to each of the Advisor and MyVest, and the Clients collectively assign limited power of attorney to one Client (“Primary Client”) to provide objectives, information and instructions for the Strategic Portfolio to the Advisor on their behalf.

As a sub-advisor to the Advisor, MyVest and not the Advisor or the Client has discretion to buy and sell securities in the Household’s Strategic Portfolio(s) and liquidate previously purchased securities that are transferred into the Household’s Strategic Portfolio(s).

MyVest does not provide direct services to Clients. The Advisor retains the responsibility for the Client relationship, determines Client suitability and investment objective on an initial and ongoing basis, maintains Client communication, coordinates designation of the custodian and develops and maintains the Client Investment Policy Statement (“IPS”) which provides the guidelines and policies for the management of each Strategic Portfolio. For each Strategic Portfolio in the Household, the Advisor selects a Strategy (a target portfolio as further defined below) and Portfolio Optimization Mode consistent with the IPS for the Strategic Portfolio and thereafter provides ongoing advice on the Personalization or replacement of the Strategy. The services offered by MyVest include:

- Overlay Portfolio Management
- Identification of third party Strategists & Model Managers
- Sub-advisory contractual engagement of selected third party Strategists & Model Managers (enrollment in the SPN)
- Initial and ongoing evaluation of third party Strategists & Model Managers in the SPN and potential candidates for the SPN
- Ongoing review of Strategic Portfolios to ensure adherence to IPS guidelines
- Rebalancing and tax optimization of Strategic Portfolios in compliance with Personalizations, and Strategist and Model Manager portfolio updates
- Reporting of Strategic Portfolio performance, market value, holdings and transactions
- Back office support systems, including portfolio accounting, interfacing and reconciliation with the Client’s custodian, generation of an Investment Policy Statement for each Strategic Portfolio, and trade order placement with the Client’s custodian

The Advisor remains solely responsible for understanding the Clients’ individual financial situation, investment goals and objectives, qualification, time horizon, portfolio liquidity and concentration, and tolerance for risk as well as any investment limitations and reasonable restrictions for each Strategic Portfolio. Based upon this knowledge, the

Advisor selects a suitable Strategy for each Strategic Portfolio. Thereafter, the Advisor is solely responsible for maintaining communication with each Client, monitoring adherence to the Client's investment objectives, monitoring for any changes in each Client's individual circumstances, and for communicating any changes in any Client's situation to MyVest in the form of a more suitable Strategy, instructions, or Personalizations. Any questions a Client may have regarding a recommended or selected Strategy, the Manager Models comprising the Strategy, or suitability of the Strategy for the Client's individual financial situation should be directed solely to the Advisor.

Strategists, Model Managers, and the Strategic Portfolio Network™ (SPN)

Each Strategic Portfolio is based on a Strategy. Each Strategy is comprised of one or more model portfolios ("Models") and/or individual securities, mutual funds, or exchange traded products (ETPs) in a weighted allocation, as determined by its Strategist. Each Model can be comprised of a weighted list of individual securities, ETPs, and/or mutual funds and represents the investment recommendations of a third party registered investment manager that is a sub-advisor to MyVest in the SPN ("Model Manager"). Ongoing changes to each Strategy are communicated to MyVest by its Strategist or Model Manager via SPS. The Strategist is responsible for researching and evaluating the Models available in the SPN, including the holdings in the Models, when selecting Model(s) to include within a Strategy. The Strategist is also responsible for researching and evaluating any individual securities, ETPs, and/or mutual funds the Strategist includes in a Strategy. MyVest enters into a sub-advisory agreement with each third party Strategist for these services, whereupon the Strategist joins the SPN. The third party Strategist does not have discretion to implement the Strategy and does not provide individualized investment advice to Clients. An Advisor may also be a Strategist, or be a Model Manager providing one or more Models used in one or more Strategies. In certain cases, certain Strategists may pursue an investment strategy that utilizes mutual funds or ETPs advised by the Strategist or its affiliate(s) ("Proprietary Funds"). In such situations, the Strategist or its affiliate(s) may receive fees from the Proprietary Funds for serving as investment advisor or other service provider to the Proprietary Fund (as detailed in the Proprietary Fund's prospectus). These fees will be in addition to the management fees that a Strategy provider receives for its ongoing management of Strategies and creates a financial incentive for the Strategist to utilize Proprietary Funds. Clients should discuss any questions with, or request further information from, their Advisor concerning the use of Proprietary Funds in Strategies or the conflict of interest this creates.

Overlay Portfolio Management

MyVest is the overlay portfolio manager (“OPM”) for each Strategic Portfolio. In providing OPM Services, MyVest controls the trades in each Strategic Portfolio as described below. Upon acceptance of the IPS, MyVest will implement the Strategy selected by the Advisor, as may be customized by Personalizations and other instructions entered by the Advisor into SPS, on an ongoing basis and execute transactions necessary to maintain reasonable alignment of the Strategic Portfolio to its Strategy, Personalizations, and other instructions.

In the provision of OPM Services, MyVest requires limited discretionary authority from the Clients to implement the Strategy, Personalizations, and other instructions for each Strategic Portfolio via the purchasing and selling of securities. This authority is provided in the Strategic Portfolio Agreement and is in addition to the authority that Clients provide to the Advisor (also via the Strategic Portfolio Agreement), who also maintains limited discretionary authority over their Clients’ Strategic Portfolios at all times.

In providing the OPM Services, MyVest relies on the information entered into SPS by the Advisor. If that information is inaccurate or incomplete, MyVest’s ability to provide OPM Services may be adversely affected.

MyVest’s OPM Services may cause the actual performance, allocation, and holdings in a Strategic Portfolio to vary from the “stated” (i.e., advertised) performance of the Strategy chosen (such performance typically assumes no Personalizations or other customizations to the “pure” Strategy). The OPM Services do not guarantee any investment results and there can be no assurance that such services will improve the after-tax investment performance or the Client’s general tax situation.

Personalizations

The Advisor may instruct MyVest to restrict a Strategic Portfolio from investing in the securities of specific companies or industries, restrict the sale of certain securities currently owned by a Client or named in the Strategy, or otherwise constrain the holdings in a Strategic Portfolio (each restriction, constraint, or other customization instruction is a “Personalization”). In the case of industry restrictions, MyVest relies on third party providers for industry classification data and makes no guarantee as to the accuracy of such third party information. To the extent that a particular security or industry may be included in the holdings of an ETP or mutual fund, the ability to restrict typically will not apply. MyVest may implement restrictions by taking one or both of the following actions: (A) “true up” proportions of other securities in order to find an acceptable range of tracking error and/or (B) increasing money market or cash positions in the Strategic Portfolio, all as determined in MyVest’s sole discretion as OPM.

Personalizations imposed on a Strategic Portfolio are likely to cause the performance of the Strategic Portfolio to differ from the “stated” (un-personalized) performance of the Strategy. MyVest reserves the right to “reject” a Strategic Portfolio or terminate an existing Strategic Portfolio if the requested restriction(s) impact MyVest’s ability to effectively manage the Strategic Portfolio.

Services Not Offered

MyVest does not provide financial planning, legal, tax, security rating and pension consulting or market timing services. MyVest does not provide OPM services directly to individual clients. MyVest does not provide MPS Programs to Sponsors that do not also license SPS.

Custody

MyVest does not accept or maintain custody of any accounts or assets. All Clients must place their assets with a qualified custodian as specified in the Strategic Portfolio Agreement. Clients are required to select their own custodian to safeguard and service their assets, and direct MyVest to utilize that custodian for placing and executing trade orders in their Strategic Portfolio.

Fees and Compensation

In the MPS Program, Clients pay an ongoing Wrap Fee for the services provided. The scope and nature of each MPS Program is jointly determined by MyVest and the Sponsor as a result, MPS Program Fees are negotiable from MPS Program to MPS Program. The Advisory Fee is generally negotiable between the Client and the Advisor and is set out in the Investment Policy Statement. Generally, the Client pays for the services provided in the MPS Program in three components:

- **Strategic Portfolio Fee** - MyVest receives an asset based fee for administering the MPS Program (Fee range TBD).
- **Advisory Fee** - The Advisor receives an asset based fee for the investment advisory services provided (Fee range TBD).
- **Program Fee** - The Sponsor receives an asset based fee for custody and trading services and/or offering its personalized MPS Program (Fee range TBD).

The Strategic Portfolio Fee compensates MyVest and its sub-advisors for providing OPM Services and the services of the Strategic Portfolio Network™. The Strategic Portfolio Fee includes the expense of the Strategist (“Strategist Fee”) for the development and ongoing management of a Strategy for the Strategic Portfolio (including ongoing tactical and asset allocation changes), and the expense of Model Managers for the development and ongoing management of Models that are components of the Strategy. The Strategist Fee generally ranges from 0% to 0.35%. The Strategic Portfolio Fee may vary based on the composition of the Strategy to which the Strategic Portfolio subscribes (e.g., higher or lower allocations to equity vs. fixed income; active vs. passive; mutual funds vs. ETPs vs. Models) but generally will not exceed 1.0% of the total market value of the Strategic Portfolio. MyVest may impose a minimum Strategic Portfolio Fee for each Strategic Portfolio. The Strategic Portfolio Fee does not include the license fee for SPS; which is paid separately by the Sponsor.

Fee Calculations

All fees shall be calculated and payable quarterly in arrears based on the market value on the last business day of the prior calendar quarter. For example, in April, AUM will be totaled as of March 31 (i.e., the last business day of the prior calendar quarter) and the Client will be charged the fees due on such AUM.

For new Strategic Portfolios enrolled in the MPS Program in the midst of a billing period, the fee calculated at the end of the period will be prorated for the number of days the Strategic Portfolio was active.

A Client may terminate its Strategic Portfolio Agreement in accordance with the terms of the Strategic Portfolio Agreement. In addition, MyVest and/or the Sponsor may terminate the MPS Program as set forth in the Sponsor Agreement and/or the Strategic Portfolio Agreement. When a Strategic Portfolio or a single account within a multi-account Strategic Portfolio is terminated, the fees calculated at the end of the billing period will be prorated for the number of days active during the period.

Fee Payments

All Strategic Portfolio Fees are payable solely to MyVest by each custodian. MyVest is responsible for the disbursement of the Strategist and Model Manager fees as applicable to each Strategic Portfolio. Typically within five business days following the end of a billing period, MyVest will notify the custodian of the amount of the Strategic Portfolio Fee due and payable to MyVest. The custodian does not validate or check the fee, its calculation or the assets on which the fee is based. The custodian will “deduct” the Strategic Portfolio Fee from the designated Strategic Portfolio account(s) as was

specified by the Advisor when the Strategic Portfolio was established (or as changed by the Advisor thereafter) and submit such fee to MyVest.

Fee payments will generally be made through the redemption of money market fund shares or cash positions maintained in each Strategic Portfolio. If insufficient cash funds exist to meet the Strategic Portfolio Fee obligations, securities in the designated Strategic Portfolio account(s) may be sold (the selection of which is in MyVest's sole discretion) in order to generate sufficient cash with which to cover the debit balance. MyVest anticipates the Strategy selected for each Strategic Portfolio by the Advisor will allocate a sufficient portion of the assets within the Strategy to cash or money market positions in order to avoid such liquidations.

Each month, the Client will receive an account statement directly from their custodian showing all transactions, positions and credits/debits into or from each Strategic Portfolio account. In addition the quarterly statements produced by SPS after the quarter end will reflect these transactions.

Comparison Cost of Services

The MPS Program may cost Clients more or less than purchasing services separately depending on the frequency of trading in the Strategic Portfolio, commissions charged at other broker-dealers for similar products, fees charged for like services by other broker-dealers and other factors. Among the factors impacting the relative cost of the program to a particular Client include the size of the Strategic Portfolio and specific Strategy to which the Strategic Portfolio subscribes to.

Additional Fees and Expenses

Client accounts may incur certain fees or charges imposed by third parties, other than those outlined above in connection with investments made on behalf of their Strategic Portfolio or for other reasons. The Client should review the fees charged by pooled funds, their custodian, their Advisor, and MyVest to fully understand the total fees to be paid.

Mutual Fund Expenses

Fees paid for the MPS Program services are separate and distinct from the expenses charged by mutual funds and exchange traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee.

Redemption Fees

In order to protect the interest of long-term shareholders, funds may impose redemption or other administrative fees if shares are not held for a minimum time period. In addition, Clients are responsible for any short-term trading fees that result from the sale of existing investments (if any) to initially fund the Strategic Portfolio(s) and any subsequent withdrawals.

Miscellaneous Fees

The MPS Program fees also do not cover charges resulting from trades with or through broker-dealers other than the Client's directed broker-dealer, or mark-ups or mark-downs by such other broker-dealers, transfer taxes, exchange fees, SEC Fees, odd-lot differentials, handling charges, electronic fund and wire transfer fees, or any other charges imposed by law or otherwise applicable to the Client's Strategic Portfolio(s).

Advisor Compensation

The Advisor recommending the MPS Program to the Client receives compensation as a result of the Client's participation in the MPS Program. This compensation includes a portion of the Wrap Fee and also may include other compensation. The Advisor is responsible for determining the total fee to charge each Client based on factors such as total amount of assets involved in the relationship, the number, complexity and mix of the Strategic Portfolios, and the number and range of supplementary advisory and Client-related services to be provided to the Strategic Portfolio. Clients should consider the level and complexity of the advisory services to be provided when negotiating fees with the Advisor. Therefore, the amount of this compensation may be more than what the Advisor would receive if the Client participated in other programs, programs of other investment advisors or paid separately for investment advice, brokerage and other client services. Therefore, the Advisor may have a financial incentive to recommend a MPS Program account over other programs and services.

Item 5 Account Requirements and Types of Clients

MyVest specializes in providing personalized OPM Services and its Strategic Portfolio Network™ for the benefit of clients of wealth management firms, broker-dealers, banks, and custodians ("Sponsors"). MyVest currently offers its OPM Services and its Strategic Portfolio Network™ to Sponsors who, through their employees or agents ("Advisors"), provide continuous and regular investment advisory services to their Clients.

The minimum Strategic Portfolio size for Clients is set by the Sponsor for each MPS Program and will vary depending on the Strategy subscribed to.

In general, The minimum initial investment amount and market value for Strategic Portfolios that subscribe to Strategies or Models containing only mutual funds and/or ETPs is \$35,000, the minimum initial investment amount and market value for Strategic Portfolios that subscribe to Strategies or Models containing individual equities is \$50,000, and the minimum initial investment amount and market value for Strategic Portfolios that subscribe to Strategies or Models containing individual fixed income securities is \$400,000.

MyVest's MPS Program is suitable for Clients seeking a long-term investment program that allows them to work with an Adviser and pay the Adviser an ongoing Advisory Fee. The MPS Program is not suitable for short-term investors, those who need trade execution only, or those who require only incidental investment advice.

Client relationships vary in scope and length of service. MyVest reserves the right to decline any new Strategic Portfolio, or to terminate its services with any Strategic Portfolio after initiation of an investment advisory relationship.

Item 6 Portfolio Manager Selection and Evaluation

Selection of Managers

When selecting Strategists to be included in or excluded from the Strategic Portfolio Network™, MyVest's Investment Committee ("Investment Committee") bases its decisions on quantitative, qualitative, and infrastructure criteria, which may include:

Quantitative Criteria

- Number & Types of Strategies
- Competitive Fees
- Number of Employees
- Years in the Business
- Performance
- Number of Accounts Managed
- Assets Under Management (AUM) and Assets Under Advisement (AUA)

Qualitative Criteria

- Investment Philosophy and Process Consistency
- Strategy Capacity and Process
- Brand Reputation
- Assessment of Investment Team
- Risk Controls

- Disclosure and Regulatory Issues

Infrastructure Criteria

- Back Office Review
- Client Servicing Resources

To form recommendations, the Investment Committee may use both publicly available and licensed information, to gather due diligence information. The Investment Committee may use information from Morningstar, Factset, Zephyr, or other investment software. The Investment Committee may use information learned from participation in Strategist and Model Manager conference calls and on-site due diligence meetings.

The Investment Committee reviews Strategists and Model Managers currently participating in the program and reviews new Strategists and Model Managers prior to their addition to the program. The Investment Committee may elect to remove a Strategist or Model Manager should it determine that the Strategist or Model Manager no longer meets one or more of the above selection criteria or other pertinent criteria (e.g., significant change in investment philosophy). In making a decision to remove a Strategist or Model Manager, the Investment Committee takes into consideration all criteria; no one criterion is necessarily a determinant in the removal and/or replacement decision. Additionally, in its review process, the Investment Committee places emphasis on long-term overall Strategist or Model Manager Performance from a quantitative viewpoint. Short-term developments are monitored but are not necessarily sufficient for a decision to remove a Strategist or Model Manager.

It's important to note that MyVest does not directly recommend or select any specific Strategist or Model Manager for particular Clients. For each Strategic Portfolio in the Household, the Advisor selects a Strategy consistent with the IPS for the Strategic Portfolio and thereafter provides ongoing advice on the Personalization or replacement of the Strategy or Model Manager.

Performance Information

The Investment Committee uses information provided by the Strategist and/or Model Manager and also may use independent, third party data sources as a result; Strategist and/or Model Manager Performance information is not calculated on a uniform and consistent basis. MyVest does not review performance information to determine or verify its accuracy and does not calculate performance. However, MyVest does provide Clients with individual quarterly performance reports generated from SPS. Client performance information is calculated by MyVest on a uniform and consistent basis using a time weighted rate of return (TWRR) basis net of all fees, except underlying fees

and expenses associated with mutual funds, ETPs, or other pooled vehicles. Performance reports are reviewed for accuracy by MyVest prior to delivery to Clients and are intended to inform Clients as to how their investments have performed for a period, both on an absolute basis and compared to leading investment indices.

Related Portfolio Managers, Supervised Persons as Portfolio Managers

It is important to note that MyVest's related persons and supervised persons do not act as the portfolio manager for the MPS Program. Strategists and Model Managers provide their Strategy and Model changes to MyVest and MyVest's OPM team has discretion for trade implementation and execution. As a result, Strategy and Model changes submitted to MyVest by Strategists and Model Managers may represent activity that has already been implemented, or has not yet been implemented, on behalf of other clients of the Strategist or Model Manager. Because of this fact and because only MyVest (and not the Strategist or Model Manager) has discretionary authority to implement trades in a Strategic Portfolio, the performance of a Strategic Portfolio will typically differ from the performance of a portfolio owned by a Strategist's or Model Manager's direct client.

Item 7 Client Information Provided to Portfolio Managers

MyVest does not provide direct services to Clients. The Advisor retains the responsibility for the Client relationship, determines Client suitability and investment objective on an initial and ongoing basis, maintains Client communication, coordinates designation of the custodian and develops and maintains the Client Investment Policy Statement ("IPS") which provides the guidelines and policies for the management of each Strategic Portfolio. For each Strategic Portfolio in the Household, the Advisor selects a Strategy and Portfolio Optimization Mode consistent with the IPS for the Strategic Portfolio and thereafter provides ongoing advice on the Personalization or replacement of the Strategy.

Because the Strategist's and Model Manager's role is limited to providing Strategies and/or Models to MyVest, and does not provide individualized discretionary advisory services to MPS Program Clients, MyVest does not communicate specific Client information to Strategists or Model Managers, unless the Strategist is also the Advisor.

Item 8 Client Contact with Portfolio Managers

Clients are free to contact their Advisors for questions or consultation in regards to their Strategic Portfolio(s). Because the Strategist's and Model Manager's role is solely to provide Strategies and/or Models to MyVest, and not to provide individualized discretionary advisory services to MPS Program Clients, Strategists and/or Model

Managers are not available to be contacted or consulted by MPS Program Clients, unless the Strategist is also the Advisor.

Item 9 Additional Information

Disciplinary Information

MyVest and its advisory personnel value the trust each Client places in us. MyVest encourages each Client to perform the requisite due diligence on any Advisor or service provider within the MPS Program. Background information about MyVest is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information for MyVest, enter CRD number (166993) in the field labeled "Firm IARD/CRD Number." This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

There are no legal, regulatory or disciplinary events involving MyVest or any of its employees.

Other Financial Industry Activities and Affiliations

MyVest and its management persons are not registered and have no application pending to register, as a broker-dealer. None of MyVest's management persons are registered representatives of a broker-dealer with the following exception:

The Chief Compliance Officer is registered with an unrelated broker-dealer. MyVest and the unrelated broker-dealer have no known mutual clients and no common business.

MyVest and its management persons are not registered and have no application pending to register, as a futures commission merchant, commodity pool operator or commodity trading advisor. None of MyVest's management persons are an associated person of the foregoing entities.

Industry Affiliations

Bill Harris, Chairman of MyVest Corporation, also serves as Chief Executive Officer of Personal Capital Advisors, an investment advisor registered with the Securities and Exchange Commission. Personal Capital Advisors utilizes MyVest Corporation's Strategic Portfolio System technology.

Paul Bergholm, Chief Financial Officer of MyVest Corporation, also serves as Chief Financial Officer of Personal Capital Advisors, an investment advisor registered with the

Securities and Exchange Commission. Personal Capital Advisors utilizes MyVest Corporation's Strategic Portfolio System technology.

Robin Kameda, Chief Compliance Officer of Personal Capital Advisors, is an investment advisor registered with the Securities and Exchange Commission. Personal Capital Advisors utilizes MyVest Corporation's Strategic Portfolio System technology.

Code of Ethics

MyVest has adopted a Code of Ethics designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940. The Code establishes rules of conduct for all employees of MyVest and is designed to, among other things; govern personal securities trading activities in the accounts of employees, immediate family/household accounts and accounts in which an employee has a beneficial interest.

The Code is based upon the principle that MyVest and its employees have a fiduciary duty to MyVest's Clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct.

MyVest has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at:

compliance@myvestadvisors.com

Personal Trading and Participation in Client Transactions

MyVest allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to Clients presents a potential conflict of interest that, as fiduciaries, MyVest must disclose to Clients and mitigate through policies and procedures. As noted above, MyVest has adopted, consistent with Section 204A-1 of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. The majority of MyVest's investing is in widely traded securities. Given the volume of these securities, it is unlikely that the trading of MyVest employees will have any material impact on the securities being traded. MyVest has also adopted written policies and procedures to detect the misuse of material, non-public information. At no time, will MyVest or any associated person of MyVest, transact in any security to the

detriment of any Client.

Review of Accounts

All new accounts receiving OPM Services are reviewed by MyVest's OPM team against the IPS provided by the Advisor. SPS generates initial trade recommendations which are reviewed, approved, and released for execution by the OPM team. On a nightly basis, Strategic Portfolios are continuously reviewed by SPS for events that would trigger a rebalance. Examples of such events that would typically result in SPS recommending trade orders for a Strategic Portfolio include tracking error changes above or below desired limits, deposits or withdrawals of cash or securities, a Strategy change by the Strategist, a Model change within a Strategy by a Model Manager, new Personalizations or changes to Personalizations, changes to the applicable IPS, and tax saving opportunities.

MyVest's OPM team will use SPS to administer each Strategic Portfolio pursuant to instructions entered into SPS by the applicable Strategist, Model Managers, and/or Advisor and is responsible for implementing the proposed trade orders resulting from the nightly SPS Strategic Portfolio review and optimization process, including trade orders resulting from Strategy and Model changes entered into SPS by Strategists and Model Managers, respectively.

MyVest's OPM team evaluates trade orders recommended by SPS prior to their execution, and sometimes postpones, modifies, and/or deletes those trade orders. SPS also considers compliance with Client Personalizations and when generating trade orders may not recommend a trade order due to a Personalization, accompany a recommended trade order with a warning that the trade order may not comply with a Personalization. MyVest's OPM team reviews such warnings and decides whether or not to proceed with executing the trade order.

Clients in a MPS Program generally receive monthly reports from the Sponsor's custody platform and also quarterly reports from SPS, including quarterly performance reports, position reports, asset allocation reports, and unrealized and realized tax gain/loss reports. Sponsors may also grant Clients 24/7 access to their portfolio data via the web where Clients may be able to access their report history on-demand.

Client Referrals and Other Compensation

MyVest is a fee-only advisor, who, in all circumstances, is compensated solely by the Client. MyVest does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party.

Financial Information

Neither MyVest, nor its management has any adverse financial situations that would reasonably impair the ability of MyVest to meet all obligations to Clients. Neither MyVest, nor any of its personnel, has been subject to a bankruptcy or financial compromise at any time during the past ten years. MyVest is not required to deliver a balance sheet along with this brochure as the firm does not collect advance fees for services to be performed six months or more in advance.