



## **Form ADV Part 2A Appendix 1 – Wrap Brochure**

Date of Brochure: January 12, 2015

MyVest Advisors  
500 Howard Street, Suite 425  
San Francisco, CA 94105  
Ph 877-204-7557  
Email [compliance@myvestadvisors.com](mailto:compliance@myvestadvisors.com)

**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 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](http://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”).

There have been no material changes since last year’s filing.

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](mailto:compliance@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.

## **Item 3 Table of Contents**

**Item 1 Cover page**

**Item 2 Material Changes**

**Item 3 Table of Contents**

**Item 4 Services, Fees and Compensation**

- A. Services Offered, Fees and Compensation
- B. Comparison Cost of Services
- C. Additional Fees and Expenses
- D. Advisor Compensation

**Item 5 Account Requirements and Types of Clients**

**Item 6 Portfolio Manager Selection and Evaluation**

- A. Selection of Managers
- B. Related Portfolio Managers, Supervised Persons as Portfolio Managers

**Item 7 Client Information Provided to Portfolio Managers**

**Item 8 Client Contact with Portfolio Managers**

**Item 9 Additional Information**

- A. Disciplinary Information
- B. Other Financial Industry Activities and Affiliations
- C. Code of Ethics
- D. Personal Trading and Participation in Client Transactions
- E. Review of Accounts
- F. Client Referrals and Other Compensation
- G. Financial Information

## Item 4 Services, Fees and Compensation

MyVest Advisors (also sometimes referred to as the “Firm”) 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 Advisors 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](http://www.myvest.com).

### Services Offered, Fees and Compensation

MyVest Advisors specializes in providing personalized overlay portfolio management services (“OPM Services”) in conjunction with its sub-advisory relationships with third party 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 (when combined referred to as “Sponsors”). MyVest Advisors combines these services with the use of MyVest Corporation’s technology (the “Strategic Portfolio System™” or “SPS”) to create a unique investment management platform for each Sponsor. MyVest Advisors currently offers its OPM, SPN, and SPS Services (when combined referred to as the Firm’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 the Firm 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.

SPS allows Advisors to manage a Client’s total holdings across multiple accounts and registrations in a personalized and 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 Client Agreement with the Firm and the Advisor in which the Clients assign limited

discretionary authority to each of the Advisor and the Firm, 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, the Firm 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 Advisors 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 Tax 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 the Firm include:

- Rebalancing and tax optimization of Strategic Portfolios in compliance with Personalizations, and Strategist and Model Manager portfolio implementation
- 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 due diligence 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
- 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 Client's 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 the Firm in the form of a more suitable Strategy, instructions, Tax Optimization Mode, 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 investment manager that is a sub-advisor to the Firm in the SPN ("Model Manager"). Ongoing changes to each Strategy are communicated to the Firm 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. 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. 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 Advisors is the overlay portfolio manager (“OPM”) for each Strategic Portfolio. In providing OPM Services, the Firm controls the trades in each Strategic Portfolio as described below. Upon acceptance of the IPS, the Firm will implement the Strategy selected by the Advisor, as may be customized by Personalizations and other Tax Optimization 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, the Firm 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 Client Agreement and is in addition to the authority that Clients provide to the Advisor (also via the Client Agreement), who also maintains limited discretionary authority over their Client’s Strategic Portfolios at all times.

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

The Firm’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, Tax Optimization, 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 the Firm 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, the Firm 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. The Firm 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 the Firm’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. The Firm reserves the right to “reject” a Strategic Portfolio or terminate an existing Strategic Portfolio if the requested restriction(s) impact the Firm’s ability to effectively manage the Strategic Portfolio.

### Services Not Offered

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

### Custody

Except for the notification to each Client’s custodian for the automatic deduction of fees from Client accounts, the Firm 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 Client Agreement. Clients are required to select their own custodian to safeguard and service their assets, and direct the Firm to utilize that custodian for placing and executing trade orders in their Strategic Portfolio.

### Fees and Compensation

For each Strategic Portfolio in the MPS Program, Clients pay the fees set forth in their investment proposal which include their Advisor Fee and the MPS Fee (collectively “My Fees”).

The MPS Fee is a combination of the Sponsor’s fee for its custodian services and the Firm’s fee for its overlay management services (the “OMS Fee”). The OMS Fee compensates the Firm for its services and the investment advisory services of its sub-advisors (the services of Strategists and Model Managers).

My Fees are payable by the Client to the Sponsor. The OMS Fee is payable by the Sponsor to the Firm, from which the Firm is responsible for the disbursement of fees due to Strategists and Model Managers. The Firm’s portion of the OMS Fee is negotiated between the Sponsor and the Firm, and the fees of the Strategists and Model Managers are negotiated between the Firm and Strategists and Model Managers, respectively.

The Firm’s portion of the OMS Fee generally ranges from .10 bps to .20 bps per annum. The Strategist and Model Manager portion of the OMS Fee generally ranges from .0 to



.75 bps per annum. The Firm may impose a minimum OMS Fee for each Strategic portfolio. The Firm's portion of the OMS Fee does not include the fee for the availability, operations, and ongoing improvement of SPS for the MPS Platform, which is paid to the Firm separately by the Sponsor.

#### Fee Calculations

All fees shall be calculated daily 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 in accordance with the terms of the Client Agreement. In addition, the Firm and/or the Sponsor may terminate the MPS Program as set forth in the Sponsor Agreement and/or the Client 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 OMS Fees are payable solely to the Firm by each Sponsor. The Firm 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, the Firm will notify the Sponsor of the amount of the Strategic Portfolio Fee due and payable to the Firm. The Sponsor does not validate or check the fee, its calculation or the assets on which the fee is based. The Sponsor will "deduct" the fees 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 the Firm.

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 the Firm's sole discretion) in order to generate sufficient cash with which to cover the debit balance. The Firm 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 the Firm 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

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 the Advisor 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 Advisors 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 (when combined referred to as "Sponsors"). The Firm 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.

The Firm'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. the Firm 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™, the Firm's 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 the Firm 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. The Firm does not review performance information to determine or verify its accuracy and does not calculate performance. However, the Firm does provide Clients with individual quarterly performance reports generated from SPS. Client performance information is calculated by the Firm 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 the Firm 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 the Firm'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 the Firm and the Firm's OPM team has discretion for trade implementation and execution. As a result, Strategy and Model changes submitted to the Firm 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 the Firm (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 Advisors 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 Tax 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 the Firm, and does not provide individualized discretionary advisory services to MPS Program Clients, the Firm 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 the Firm, 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 Advisors and its advisory personnel value the trust each Client places in us. The Firm encourages each Client to perform the requisite due diligence on any Advisor or service provider within the MPS Program. Background information about MyVest Advisors is available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information for MyVest Advisors, enter CRD number (166993) in the field labeled "Firm Name or CRD# or SEC#." 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 Advisors or any of its employees.

### Other Financial Industry Activities and Affiliations

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

MyVest Advisors 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 the Firm'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.

**Paul Bergholm, Chief Executive Officer and 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.

**Amy Hong, Chief Compliance Officer of MyVest**, also serves as Chief Compliance Officer of Personal Capital Advisors, an investment advisor registered with the Securities and Exchange Commission.

## **Code of Ethics**

MyVest Advisors 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 the Firm 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 the Firm and its employees have a fiduciary duty to the Firm'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 Advisors 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](mailto:compliance@myvestadvisors.com).

## **Personal Trading and Participation in Client Transactions**

MyVest Advisors 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, the Firm must disclose to Clients and mitigate through policies and procedures. As noted above, the Firm 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 the Firm's investing is in widely traded securities. Given the volume of these securities, it is unlikely that the trading of the Firm's employees will have any material impact on the securities being traded. The Firm has also adopted written policies and procedures to detect the misuse of material, non-public information. At no time, will the Firm or any associated person of the Firm, transact in any security to the detriment of any Client.

## **Review of Accounts**

All new accounts receiving OPM Services are reviewed by the Firm'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, changes to previous Tax Optimization settings, or changes to previous Personalizations, changes to the applicable IPS, and tax harvesting opportunities.

The Firm'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.

The Firm'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.

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.

### **Client Referrals and Other Compensation**

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

### **Financial Information**

Neither MyVest Advisors, nor its management has any adverse financial situations that would reasonably impair the ability of the Firm to meet all obligations to Clients. Neither the Firm, nor any of its personnel, has been subject to a bankruptcy or financial compromise at any time during the past ten years. The Firm 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.