



Harbour Investment Management L.L.C.

ADV Part 2A – Firm Brochure

110 James Street – Suite 111

Edmonds, WA 98020

425-742-1557

Web Site Address – N/A

Submitted March 16, 2015

For Fiscal Year Ending December 31, 2014

This Brochure provides information about the qualifications and business practices of Harbour Investment Management L.L.C. If you have any questions about the contents of this Brochure, please contact us at 425-742-1557. 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.

Additional information about Harbour Investment Management L.L.C. (Harbour) is also available on the SEC's website at www.adviserinfo.sec.gov.

Harbour Investment Management L.L.C. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Item 2 – Material Changes

Prior to this filing (March 16, 2015), our last annual update of our Brochure was submitted for filing with the Securities and Exchange Commission on March 17, 2014.

Item 2 only discusses material changes since the last annual update of the Brochure.

Subsequent to year-end 2014, Harbour began the process of mutually resigning from its largest client relationship. This client, an environmentally-conscious foundation, seeks to engage in Mission-Related Investments (MRIs) which is not a core competency of Harbour, nor an area that we would like to pursue. This change will be effective on or before March 31, 2015 and is not anticipated to materially impact Harbour's business.

We will ensure that clients receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year, without charge. Our complete Brochure may be requested by contacting Erika Hill, Chief Compliance Officer, at 425-742-1557.

Additional information about Harbour Investment Management L.L.C. is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Harbour Investment Management who are registered, or are required to be registered, as investment adviser representatives of Harbour Investment Management L.L.C.

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About Harbour Investment Management L.L.C.

Harbour Investment Management L.L.C. (“Harbour”) is a Registered Investment Adviser founded by Hans D. Berkenhoff in 1991 and based in Edmonds, Washington. Harbour’s sole purpose is the management of investment advisory accounts, and does not provide financial planning or similar services. Harbour has no subsidiaries or other business lines.

Investment management services are limited to stocks, mutual funds and exchange-traded funds, bonds, CDs and cash/money market instruments. Client portfolios are individually managed by the principals of Harbour. When one investor has multiple accounts, these are managed together as a single portfolio for investment purposes. Harbour does not participate in wrap fee programs and does not utilize other investment managers.

Clients agree on an investment objective prior to our management of their portfolio, and portfolios are managed in accordance with this objective. From time to time, clients may impose restrictions on investments, such as directing Harbour to hold a stock that was purchased prior to Harbour’s management. In these cases the client would typically sign a direction letter stating their intent. As of December 31, 2014, discretionary assets under management were \$277,804,867 and nondiscretionary assets were \$0. Harbour charges a percentage of assets under management, as detailed in Item 5.

Principal Owners

Harbour is 100% owned by its employees and their families. As of December 31, 2014, principal owners (25% or more) of Harbour were Erika L. Hill and Evan A. Hill. All three principals are related.

Item 5 – Fees and Compensation

How We Are Paid

Harbour is paid based on a percentage of assets under management. A few older accounts are charged a fixed quarterly fee. In the month following the end of each calendar quarter, fees are charged based on the closing market value (including any accrued interest and dividends). Most clients authorize Harbour to directly debit fees from client accounts, but may elect to be billed directly for fees.

Current Fee Schedule

<u>Market Value of Portfolio</u>	<u>Annual Fee (% of Assets)</u>
First \$1,000,000	0.80%
Next \$1,000,000	0.70%
Next \$3,000,000	0.50%
Amount over \$5,000,000	0.25%

Accounts opened under our current fee schedule are subject to a minimum quarterly fee of \$ 250. Accounts opened under previous fees schedules may be subject to a different minimum, or no minimum quarterly fee. Fees may be negotiated based on account size and complexity of investments. Employee and their related family accounts are not charged a fee.

Accounts may be terminated at any time by either the client or by Harbour, in which case pro-rata fees will apply at such time for the portion of the quarter said assets were under management. Accounts initiated during a calendar quarter may be charged a pro-rated fee.

Other Expenses

Harbour's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers and other third parties such as custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Harbour's fee, and Harbour does not receive any portion of these commissions, fees, and costs. Employees of Harbour do not accept compensation for the sale of securities or other investment products.

Item 12 further describes the factors that Harbour considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

Item 6 – Performance-Based Fees and Side-By-Side Management

Harbour does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Harbour provides portfolio management services primarily to individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, and trusts and estates.

Our minimum portfolio size is \$500,000 per investor. This minimum is comprised of the total of all investor's accounts (taxable, trust and retirement accounts). However, in some cases this minimum is waived when assets are considered as part of a larger client relationship, or when a pre-arranged savings plan is agreed upon with the client to bring the account to the minimum size over time.

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

Our Investment Strategies

Harbour utilizes a variety of methods of analysis in managing investment portfolios and selecting securities, including fundamental, interest rate, and economic analysis. The main sources of information used by Harbour are financial newspapers and magazines, annual reports, prospectuses and other filings with the SEC, company press releases, research prepared by others and corporate rating services. Harbour's investment strategies focus on the purchase of securities intended to be held for one year or more; short-term trading is generally avoided due to tax considerations.

Risk

Investing in securities involves risk of loss that clients should be prepared to bear. Risks include a general stock or bond market decline, an economic slowdown (domestic or global), inflation or loss of purchasing power risk, interest rate fluctuations, liquidity risk, and business or company-specific risk. All of these factors, and others, may contribute to investment losses.

Harbour seeks to mitigate these risks by diversification of portfolio assets amongst various asset classes, industry sectors and individual securities. However, clients should understand that these risks cannot be eliminated, and should be prepared to accept volatility of portfolio returns.

Item 9 – Disciplinary Information

All registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Harbour or the integrity of Harbour's management. Harbour has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Harbour is not actively engaged in a business other than giving investment advice, and has no information applicable to this Item.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

Harbour has adopted a Code of Ethics for all employees of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other items. All employees of Harbour are required to adhere to the Code of Ethics and must acknowledge this at least annually.

Potential Conflicts of Interest

Employee trading is continually monitored under the Code of Ethics, to reasonably prevent conflicts of interest between Harbour and its clients. Employees of Harbour may invest in the same securities that Harbour purchases for clients. This creates a potential conflict of interest between Harbour, employees and clients.

To address this potential conflict, all employee accounts are invested side by side with client accounts. All portfolios, including employee accounts, are managed in accordance with the model portfolio for the relevant investment objective. Employees must seek pre-clearance from the Chief Compliance Officer or another principal of the Firm prior to effecting securities transactions for an employee's personal account using the Pre-Approval Form. If an employee is participating in a block trade along with other clients, Pre-Approval is not necessary. At least annually, the Chief Compliance Officer reviews all employee trading and asset allocation. It is the belief of Harbour that using such guidelines eliminates potential conflict-of-interest transactions.

Harbour does not engage in trading for its own (corporate) account.

Harbour's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Erika Hill, Chief Compliance Officer.

Item 12 – Brokerage Practices

The Custodian and Brokers We Use

Harbour does not maintain custody of assets that we manage, although we may be deemed to have custody of client assets if we have authority to deduct investment management fees (see Item 15 – Custody). Client assets must be maintained in an account at a “qualified custodian”, generally a broker-dealer or a bank. We request that our clients use Charles Schwab & Co., Inc (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. Schwab will hold client assets in a brokerage account and buy and sell securities when we instruct them to. Harbour is independently-owned and operated and is not affiliated with Schwab.

In some historical instances, Harbour also utilized the services of D.A. Davidson to purchase bonds that may not be available through Schwab. Clients must sign a Prime Brokerage Agreement with Schwab prior to any trades being made with D.A. Davidson, and bonds are still held in the client account(s) at Schwab. Schwab imposes certain eligibility requirements for a client to participate in this service. Harbour is not currently participating in this service.

Although Schwab is the custodian for our accounts, one 401(k) portfolio that we manage opted to unitize its portfolio in 2012. Through the recommendation of the client’s 401(k) administrator, the client selected Wilmington Trust to implement the unitization process, as this was a service that Charles Schwab did not offer in a competitive manner. As part of this arrangement, the client maintains a stable value fund at Wilmington to facilitate plan cash administration. This fund is included in our Assets Under Management.

How We Select Brokers/Custodians

We select a custodian/broker who will hold client assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a range of factors, including, among others:

- a wide variety of available investment products
- capability to execute, clear, and settle trades at competitive prices
- technological capabilities
- the quality of operational support
- reputation, financial strength and stability

- convenient account access for clients, including the availability of retail offices, check writing and money transfer abilities, and Internet access
- availability of other products and services that benefit us, as discussed below (see Products and Services Available to Us From Schwab).

Brokerage and Custody Costs

For Harbour's client accounts that Schwab maintains, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts. In addition to commissions, Schwab charges a flat dollar amount as a "prime broker" fee for each trade that we execute by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited into the client's Schwab account. Because of this, in order to minimize trading costs, we have Schwab execute most trades in client accounts.

Products and Services Available to Us From Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide Harbour and our clients with access to its institutional brokerage—trading, custody, reporting, and related services - many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200.

Following is a more detailed description of Schwab's support services:

Services That Benefit Clients. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Services That May Not Directly Benefit Clients. Schwab also makes available to Harbour other products and services that benefit us but may not directly benefit clients or client accounts. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients' accounts
- assist with back-office functions, recordkeeping, and client reporting.

Services That Generally Benefit Only Us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- consulting on technology, compliance, legal, and business needs
- publications and conferences on practice management and business succession.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

Our Interest in Schwab's Services. The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. The \$10 million minimum may give us an incentive to require that clients maintain their account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on client interests in receiving the best value in custody services and the most favorable execution of their transactions. This is a potential conflict of interest.

We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us. We manage over \$200 million in client assets, and we do not believe that requiring our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

Item 13 – Review of Accounts

Each portfolio is managed in accordance with an investment objective selected by the client. These objectives are reviewed at least annually for any required changes. At Harbour, we work

on a team basis. Our investment outlook is determined jointly by our investment committee, which includes all three portfolio managers. Details on each of these portfolio managers are found in ADV Part 2B (“Brochure Supplement”), available upon request by contacting Erika Hill, Chief Compliance Officer. All portfolios are reviewed on a regular schedule by these individuals.

On a daily basis, investment transactions and securities holdings are downloaded from the custodian into a computer-based portfolio management system. It is the shared responsibility of all portfolio managers to review these transactions and cash balances on a daily basis. Accounts are also reviewed following material deposits or withdrawals.

Where appropriate, aggregate sales and purchases are allocated to all managed portfolios on a pro-rata basis based on investment objectives, asset allocation and cash availability.

Reports

Monthly or quarterly account statements and annual tax reports are provided by the custodian of the securities. Quarterly investment reports are provided by Harbour and distributed to clients. These written reports typically include:

- an asset allocation chart,
- a portfolio appraisal, which includes market value and costs basis information,
- a maturity schedule, if relevant,
- a performance report, including inception- and year-to-date performance for the portfolio,
- a quarterly letter reviewing market conditions,
- and, a copy of the most recent quarterly invoice.

Meetings are scheduled according to individual client preferences, as desired, and may take place in person or via telephone.

Item 14 – Client Referrals and Other Compensation

Harbour has no information applicable to this Item. Most referrals come from existing clients. Other sources of referrals include attorneys and accountants that work with our clients. Harbour does not compensate referring parties for referrals. While clients occasionally ask us for referrals to attorneys or CPAs, Harbour does not accept any form of compensation from other professionals when a prospect or client is referred to them.

Item 15 – Custody

Harbour has authority to deduct investment advisory fees from the majority of client accounts, with prior approval from the client. For this reason only, we are deemed to have custody of client funds according to the “custody rule” under the Investment Advisers Act of 1940.

Clients should receive at least quarterly statements from the custodian that holds and maintains client’s investment assets (Schwab). These documents will be sent to the email or postal mailing address provided by the client to Schwab. The client with a brokerage account at Wilmington Trust receives at least quarterly statements for this account. Harbour urges clients to carefully review such statements and compare such official custodial records to the account statements that we may provide to them. Our statements may vary from custodial statements based on accounting procedures, dividend and interest accruals, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Harbour typically receives discretionary authority from the client at the beginning of an advisory relationship to select the types and amount of securities to be bought or sold. Once discretionary authority is received, Harbour is not required to contact a client prior to placing trades in a client’s account. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

In addition to the Investment Management Agreement signed by both the client and Harbour, the client must sign a Limited Power of Attorney form with the custodian (Schwab) allowing Harbour to trade and disburse funds from the client’s account(s). In some cases, clients must also sign a Prime Brokerage Agreement, where this service is used (see Item 12).

Item 17 – Voting Client Securities

We generally vote proxies for all clients, except where client preferences override. It is Harbour’s policy to review each proxy statement on an individual basis and to base its voting decision exclusively on its judgment of what will best serve the financial interests of the beneficial securities owners. Harbour has established general guidelines in voting proposals, covering common topics such as director elections, mergers and acquisitions and capital authorizations. In the event that a potential conflict of interest is identified, Harbour would disclose this conflict to affected clients and obtain client consent before voting.

Clients may obtain a copy of Harbour’s complete proxy voting policies and procedures upon request. Clients may also obtain information from Harbour about how Harbour voted any proxies on behalf of their account(s). Clients may contact us by phone or in writing if they would like to direct the vote of a specific proposal on their account, provided there is sufficient notice given before the vote deadline.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Harbour's financial condition. Harbour has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.



Harbour Investment Management L.L.C.

ADV Part 2B –Brochure Supplement

Erika L. Hill, CFA

110 James Street – Suite 111

Edmonds, WA 98020

425-742-1557

March 16, 2015



This Brochure Supplement provides information about Erika L. Hill, CFA that supplements the Harbour Investment Management L.L.C. (“Harbour”) Brochure. You should have received a copy of that Brochure. Please contact Erika Hill, Chief Compliance Officer, if you did not receive Harbour Investment Management’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Erika Hill is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Erika L. Hill, CFA was born in 1972. Erika graduated from Willamette University with a Bachelor of Science in Business Economics in 1994. She also holds a Master of Science in Finance from Seattle University. Erika was awarded the Chartered Financial Analyst (CFA) charter in 1998.

In order to earn the CFA charter, an individual must have at least four years of qualified professional investment experience, become a member of the CFA Institute, commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct, and pass three sequential, six-hour examinations. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed income and equity analysis, alternative and derivatives investments, economics, financial reporting standards, portfolio management and wealth planning. Additional information about the CFA Charter can be found at www.cfainstitute.org.

Since 2006, Erika has been a Portfolio Manager with Harbour Investment Management, and Chief Compliance Officer since 2007. Prior to joining Harbour, Erika was a Senior Research Analyst and Vice President with Ragen MacKenzie, a division of Wells Fargo Investments.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Erika Hill is not the subject of any such events.

Item 4- Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any other business activities. Erika Hill is not engaged in any such activities.

Item 5- Additional Compensation

Erika Hill does not receive economic benefits such as sales awards for providing advisory services, outside of her regular salary.

Item 6 - Supervision

The person responsible for supervising Erika Hill is Hans Berkenhoff, Portfolio Manager, 425-742-1557. There are several procedures in place for supervision at Harbour. All trades are reviewed the following day by a portfolio manager who is not the individual initiating the trades. All decisions regarding the addition or removal of a security to or from the recommended list are made by a committee of the three principals of Harbour. At least quarterly, all accounts with similar investment objectives are reviewed side by side and any variances addressed.



Harbour Investment Management L.L.C.

ADV Part 2B –Brochure Supplement

Evan A. Hill

110 James Street – Suite 111

Edmonds, WA 98020

425-742-1557

March 16, 2015



This Brochure Supplement provides information about Evan A. Hill that supplements the Harbour Investment Management L.L.C. (“Harbour”) Brochure. You should have received a copy of that Brochure. Please contact Erika Hill, Chief Compliance Officer, if you did not receive Harbour Investment Management’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Evan Hill is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Evan A. Hill was born in 1971. Evan graduated from Willamette University with a Bachelor of Arts in 1994. He also holds a Master's in Business Administration (MBA) from Seattle University.

Since 2008, Evan has been a Portfolio Manager with Harbour Investment Management. Prior to joining Harbour, Evan was an Assistant at George Robertson Financial Services (GWR Financial) in Seattle, Washington.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Evan Hill is not the subject of any such events.

Item 4- Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any other business activities. Evan Hill is not engaged in any such activities.

Item 5- Additional Compensation

Evan Hill does not receive economic benefits such as sales awards for providing advisory services, outside of his regular salary.

Item 6 - Supervision

The person responsible for supervising Evan Hill is Hans Berkenhoff, Portfolio Manager, 425-742-1557. There are several procedures in place for supervision at Harbour. All trades are reviewed the following day by a portfolio manager who is not the individual initiating the trades. All decisions regarding the addition or removal of a security to or from the recommended list are made by a committee of the three principals of Harbour. At least quarterly, all accounts with similar investment objectives are reviewed side by side and any variances addressed.



Harbour Investment Management L.L.C.

ADV Part 2B –Brochure Supplement

Hans D. Berkenhoff, CFA

110 James Street – Suite 111

Edmonds, WA 98020

425-742-1557

March 16, 2015



This Brochure Supplement provides information about Hans D. Berkenhoff, CFA that supplements the Harbour Investment Management L.L.C. (“Harbour”) Brochure. You should have received a copy of that Brochure. Please contact Erika Hill, Chief Compliance Officer, if you did not receive Harbour Investment Management’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Hans Berkenhoff is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Hans D. Berkenhoff, CFA was born in 1940. Hans graduated from the University of Minnesota with a Bachelor of Science in Economics in 1966. Hans was awarded the Chartered Financial Analyst (CFA) designation in 1975.

In order to earn the CFA charter, an individual must have at least four years of qualified professional investment experience, become a member of the CFA Institute, commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct, and pass three sequential, six-hour examinations. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed income and equity analysis, alternative and derivatives investments, economics, financial reporting standards, portfolio management and wealth planning. Additional information about the CFA Charter can be found at www.cfainstitute.org.

Since 1991, Hans has been a Portfolio Manager with Harbour Investment Management.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Hans Berkenhoff is not the subject of any such events.

Item 4- Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any other business activities. Hans Berkenhoff is not engaged in any such activities.

Item 5- Additional Compensation

Hans Berkenhoff does not receive economic benefits such as sales awards for providing advisory services, outside of his regular salary.

Item 6 - Supervision

The person responsible for supervising Hans Berkenhoff is Erika Hill, Chief Compliance Officer, 425-742-1557. There are several procedures in place for supervision at Harbour. All trades are reviewed the following day by a portfolio manager who is not the individual initiating the trades. All decisions regarding the addition or removal of a security to or from the recommended list are made by a committee of the three principals of Harbour. At least quarterly, all accounts with similar investment objectives are reviewed side by side and any variances addressed.