

HARVEST ASSET MANAGEMENT, LLC

FIRM BROCHURE (ADV PART 2A)

MARCH 30, 2015

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This brochure provides information about the qualifications and business practices of Harvest Asset Management, LLC. If you have any questions about the contents of this brochure, please contact us at (804) 788-41003. 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.

Harvest Asset Management, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The written communications of an Adviser provide you with information for your use in determining whether to hire or retain the Adviser.

Additional information about Harvest Asset Management, LLC is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for the Adviser is 149503.

2. MATERIAL CHANGES

The firm does not have any material changes to report since its last annual update to this ADV Part 2 on March 28, 2014.

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4. ADVISORY BUSINESS

A. OWNERSHIP/ADVISER HISTORY

Harvest Asset Management, LLC (“Harvest”) is a Virginia limited liability company. Harvest is registered with the Securities and Exchange Commission. Harvest is owned and managed by Kyle Mills.

B. ADVISORY SERVICES OFFERED

Before Harvest enters into an Adviser-Client relationship, Harvest may offer a complimentary general consultation to discuss services available, give a prospective client time to review services desired, and determine whether a relationship might benefit the client. Investment advisory services begin only after Harvest and the client formalize the relationship with a properly executed Client Agreement. Harvest offers the following services:

i. FINANCIAL PLANNING SERVICES

Financial planning services may include consultations and/or written financial plans, which analyze a client's financial situation and makes appropriate recommendations for strategies and methods of implementation of the strategies. Depending on client needs and desires, Harvest's initial information gathering may include the client's:

- Personal situation including age, family members, beneficiaries, etc.
- Risk Tolerance
- Goals
- Current financial situation and concerns
- Documents that apply to their financial situation, such as Wills, Advance Medical Directive/Living Will, Trusts, Powers of Attorney etc.

Again, mindful of the client's personal situation and needs, Harvest may utilize that information to provide:

- An analysis of the client's financial strengths and weaknesses
- Retirement funding analysis based on either capital preservation (retiring without using the client's principal) or life needs (retirement funding based of what the client will actually spend in retirement)
- Planning to finance education
- Advising on potential insurance needs
- Estate planning
- Asset allocation
- Tax advising
- Active investment management

ii. PORTFOLIO MANAGEMENT SERVICES

Portfolio management services involve assisting with the ongoing management of investment accounts taking into account individual investment preferences and risk tolerance considering the overall investment climate.

Harvest may first conduct a complimentary initial consultation. Harvest can then be engaged to provide investment management services. The scope of the engagement will be described in a signed written Investment Management Agreement.

Harvest provides several investment strategies that include but are not limited to the following:

Harvest Low Volatility Income Portfolio: Low volatility income oriented portfolio composed of high-yield corporate and floating rate mutual funds. Designed to realize returns that are meaningfully higher than money market instruments, while keeping volatility and drawdown of principal to a low-risk tolerance through the implementation of a disciplined and tactically driven quantitative allocation strategy.

Harvest Moderate Growth and Income Portfolio: This portfolio has a mandate to focus on a broad range of higher-generating income securities such as high-yield corporate bonds, emerging market debt, preferred securities and convertible securities. The portfolio is designed for investors who desire high income with the potential for modest capital appreciation and have a slightly higher risk tolerance. Risk and volatility are mitigated through the implementation of a disciplined and tactically driven quantitative allocation strategy.

Harvest Growth Portfolio: This portfolio places primary emphasis on the potential for capital appreciation and secondary emphasis on income. The portfolio will diversify across a broad range of equity classes, including but not limited to large cap, small cap, international small cap, and REITs. As with all our strategies, risk and volatility are mitigated through the implementation of a disciplined and tactically driven quantitative allocation strategy.

iii. RECOMMENDATION OF THIRD PARTY ADVISORS

Harvest may recommend the services of a third party investment adviser (“Third Party Adviser”). The recommendation will depend on the client’s circumstances, goals and objectives, strategy desired, account size, risk tolerance, or other factors. Harvest works with each client to determine which Third Party Adviser may be appropriate. Clients are never obligated to use a recommended Third Party

Harvest reviews Third Party Advisers prior to making a recommendation to the client. Harvest considers the following factors during its review: fees, reputation, performance, financial strength, management, price, reporting capabilities, client’s financial situation, client’s goals, client’s needs, and client’s investment objectives. After the review Harvest presents the client with one or more recommendations.

If the client wishes to proceed with the recommendation, Harvest enters into either a co-advisor relationship or solicitor arrangement with the recommended Third Party Adviser. Under these arrangements, the Third Party Adviser is responsible for portfolio management, best execution, portfolio reporting, trading, trade error resolution, and custodian reconciliations. While Harvest maintains its relationship with the client by monitoring the status of the client’s accounts with the Third Party Adviser, make recommendations about the Third Party Adviser, usually meeting with the client either in person or by telephone on an annual basis annually and acting as the client’s primary financial adviser. All questions regarding the Third Party Adviser’s services and performance will be directed to Harvest.

Because the compensation Harvest receives under these arrangements may differ depending on the agreement with each third-party adviser, Harvest may have an incentive to recommend one Third Party Adviser over another if the compensation arrangements are more favorable. Also, because the Third Party Adviser may pay Harvest a portion of their fee, the fee paid is not negotiable, under most circumstances.

Clients who are referred to Third Party Advisers will receive full disclosure, including services rendered and fee schedules, at the time of the referral, by delivery of a copy of the relevant Third Party Adviser's Form ADV Part 2A or equivalent disclosure document before receiving investment advisory services from the third-party adviser.

In addition, if the investment program recommended to a client is a wrap fee program the client will receive the Appendix 1 or equivalent wrap fee brochure provided by the sponsor of the program. Harvest provides to each client all appropriate disclosure statements, including disclosure of solicitation fees paid to Harvest and its advisory associates.

Harvest will not refer a client to a Third Party Adviser unless it is registered or exempt from registration as an investment adviser in the client's state of residence.

C. TAILORED SERVICES

Harvest will tailor its advisory services to its client's individual needs based on meetings, conversations and completion of a client profile (as applicable). If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client's requirements.

D. WRAP PROGRAM

Harvest does not sponsor or participate in a wrap program. This section is not applicable.

E. CLIENT ASSETS MANAGED

As of March 30, 2015, Harvest manages \$108,000,000 in discretionary assets and \$1,286,432 in non-discretionary assets.

5. FEES AND COMPENSATION

A. FINANCIAL PLANNING SERVICES

Harvest's Financial Planning Services are offered on a fixed or hourly fee basis.

Fixed fees are charged with Harvest produces a written financial plan. The fee ranges from \$400 to \$2,000, depending on the complexity of a client's financial situation, time for researching, data gathering, and preparation of the plan. Half the fee is due in advance, the rest upon presentation of the plan. If a client cancels, any prepaid fees will be refunded on a pro-rated basis.

The negotiable hourly fee is up to \$200 and is paid after the consultation.

B. PORTFOLIO MANAGEMENT SERVICES

Fees for portfolio management services will be a percentage of the assets under management. The fee will be calculated, accrued and due quarterly in advance based upon an annualized rate

that ranges from .50% to 2.00%.

The pro-rated first quarter's management fee will be calculated on the Account's initial value as reported by its custodian. Thereafter, the periodic fee will be based upon the beginning of each quarter's Account balance as reported by the client's custodian. Cash balances and investments in money market funds, demand deposit accounts, and certificates of deposit at banks or brokerage firms are covered by the Account and are included in the fee calculations.

Fees will not be based upon a share of capital gains or capital appreciation of the funds or of any portion of the funds under advisory contract. Fees for services to be performed will not be collected six or more months in advance.

Harvest's fees are separate and distinct from any fees or expenses incurred from the implementation of the financial plan. These fees and expenses may include brokerage commissions, transaction fees, and other related costs and expenses. Additionally, clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, 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, as disclosed in a fund's prospectus, which are separate and distinct from the firm's fee.

C. RECOMMENDATION OF THIRD PARTY ADVISORS

As stated in Item 4.B.iii. (See Above), Harvest will either be a Co-Adviser or solicitor of the recommended Third Party Adviser. The fees associated with each service are as follows:

Co-Adviser Relationship

When Harvest is a Co-Adviser, it charges a fee based upon an annual percentage of the assets under management as reported by the Third Party Adviser. The annual fee is negotiable between .50% and 2.00%. The client will be asked to authorize the Third Party Adviser with the ability to withdraw Harvest's fee. When the fee is collected (quarterly or monthly, in advance or in arrears) will vary with each Third Party Adviser. These details will be disclosed in the Third Party Adviser's ADV Part 2A that is given to the client upon solicitation.

Solicitor Relationship

When Harvest is a solicitor of the recommended Third Party Adviser it does not charge a separate fee for the Recommendation and Monitoring of Third Party Investment Adviser Services. Instead, Harvest enters into an agreement with the selected Third Party Adviser and share in a portion of the Third Party Adviser's management fee that is charged to the client. Harvest's portion of the fee typically ranges from .50% to 2.00%. The exact fee withdrawn and when it is withdrawn (quarterly or monthly, in advance or in arrears) will vary with each Third Party Adviser. These details will be disclosed in the Third Party Adviser's ADV Part 2A and the Third Party Adviser's Solicitor Disclosure Document; both documents will be given to the client upon solicitation.

By receiving a portion of the Third party Advisor's management fee, this creates a conflict of

interest for Harvest. The sharing of the management fees creates a financial incentive to recommend Third Party Advisers that would pay Harvest a higher percentage of their fee. Harvest attempts to mitigate the conflict of interest to best of its ability by placing the client's interest a head of its own, through its fiduciary duty and by following its Code of Ethics that establishes ideals for ethical conduct.

D. TERMINATION OF SERVICES

A client may terminate any services for any reason within the first five (5) business days after signing the contract and receive a 100% refund of any fees paid without any cost or penalty. Thereafter, financial planning and investment management agreements may be terminated by giving ten (10) days written notice. Pension and profit sharing services may be terminated by giving 30 days written notice. Upon receipt of the written termination notice, fees will be prorated for the number of days that services were rendered during the termination quarter. All unearned fees will be refunded to the client. The written notice of termination must be sent to Harvest Financial Group, LLC, 9003 Quioccasin Road #200, Richmond, VA 23229.

E. ADDITIONAL DISCLOSURES

NOTE: Lower fees for comparable services may be available from other sources, and clients may terminate at any time and for any reason.

Conflicts of Interest Disclosure

Pursuant to California Code of Regulations Section 260.238(k), in this Part 2, Harvest, its representatives and employees have disclosed all material conflicts of interests that could reasonably be expected to impair the rendering of unbiased and objective advice.

Conflicts of Interest Disclosure

Please note that a conflict of interest exists between Harvest, its investment adviser representatives, and you, the client. You are under no obligation to act on the firm's financial planning recommendations. Should you choose to act on any of the firm's recommendations, you are not obligated to implement the financial plan through any of firm's other investment advisory services. Moreover, you may act on the firm's recommendations by placing securities transactions with any brokerage firm.

Harvest's fees, both fixed and based on assets under management, vary based on the following factors:

- Larger accounts may incur lower fees as a percent of assets
- Clients with more complex family and personal situations (and therefore more complex financial planning needs) may incur higher fees
- Clients with more individual investment instruments or more complex and unique investments may incur higher fees
- Clients who prefer less personal interaction may incur lower fees
- Clients who desire fewer services may incur lower fees.

6. PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

Harvest 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) or perform side-by-side management. Therefore, this section is not applicable.

7. TYPES OF CLIENTS

Harvest offers its services to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities. Harvest does not require a minimum account size to become a client.

8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES AND THEIR RISKS

With respect to the firm's financial planning services, it uses an individualized asset allocation method for each client. When deciding on the asset allocation for a client, the firm takes into account the client's risk tolerance, goals, investment objectives and other data gathered during the client meetings. Asset Allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to an individual's goals, risk tolerance and investment horizon among various asset classes. The asset classes typically include equities, fixed-income, and cash and equivalents. The risk associated with asset allocation is that each class has different levels of risk and return, so each will behave differently over time. Also, despite being diversified there is no guarantee that an account will grow.

Harvest uses charting analysis and technical analysis when selecting securities for client accounts.

Charting analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Charting analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity.

Technical Analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. The risk associated with technical analysis is that there is no broad consensus among technical traders on the best method of identifying future price movements.

To help develop its strategies and recommendations, Harvest uses the services of unaffiliated Third Party Investment Advisers ("TPA"). Prior to engaging a TPA Harvest completes a thorough due diligence process that reviews, among other things, the TPAs regulatory history, management stability, and investment results. In addition to the due diligence conducted on the TPA itself, Harvest reviews the investment and financial market information received from the TPA. Harvest uses its proprietary tools to analyze the TPAs' information to determine the proper TPA to use with each client. The TPA combination will be unique to clients. The risks associated with using TPAs is that their information may not always be accurate.

B. RECOMMENDED SECURITIES AND INVESTMENT RISKS

Harvest uses several types of securities in its clients' accounts. These securities may include, but are not limited to, the following: Bonds and other corporate debt instruments; Exchange Traded Funds; Mutual Funds such as Large Cap Growth, Large Cap Value, Mid Cap Growth, Mid Cap Value, Small Cap Growth, and Small Cap Value; Government Debt instruments including Treasury Bills and Municipal securities; Stocks; Preferred Stock; High Yield Debt; Domestic Fixed Income; Options (covered options only); Money Market Funds and Cash.

All investments bear different types and degrees of risk and **investing in securities involves risk of loss that clients should be prepared to bear.** While Harvest uses investment strategies that are designed to provide appropriate investment diversification, some investments have significantly greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. A client's needs to ask questions about risks he/she does not understand. The firm would be pleased to discuss them.

Harvest strives to render its best judgment on behalf of its clients. Still, it cannot assure or guarantee clients that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment adviser but is not a reliable predictor of future performance. The firm continuously strives to provide outstanding long-term investment performance, but many economic and market variables beyond its control can affect the performance of an investment portfolio.

An investment could lose money over short or even long periods. A client should expect his/her account value and returns to fluctuate within a wide range, like the fluctuations of the overall stock and bond markets. A client's account performance could be hurt by:

- **Stock market risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.
- **Interest rate risk:** The chance that bond prices overall will decline because of rising interest rates.
- **Manager risk:** The chance that the proportions allocated to the various securities will cause the client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- **International investing risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, that differ from those of the U.S.

- **Liquidity risk:** One common risk associated with private placements and REITs is a relative lack of liquidity due to the highly customized nature of the investment. Moreover, the full extent of returns is often not realized until maturity. Because of this, these products tend to be more of a buy-and-hold investment decision rather than a means of getting in and out of a position with speed and efficiency.
- **Credit risk:** This is the risk that an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.
- **Inflation Risk:** This is the risk that inflation will undermine the performance of your investment and/or the future purchasing power of your assets.
- **Portfolio Concentration:** Accounts not diversified among a wide range of types of securities, countries or industry sectors may have more volatility and are considered to have more risk than accounts that are invested in a greater number of securities because changes in the value of a single security may have more of a significant effect, either negative or positive. Accordingly, portfolios are subject to more rapid changes in value than would be the case if client maintained a more diversified portfolio.

9. DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events within the past 10-years that would be material to your evaluation of the Adviser or the integrity of its management.

Harvest has no information applicable to this Item because it has not been the subject of any administrative, civil, criminal, regulatory (SEC or State) or self-regulatory proceedings.

10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. BROKER-DEALER AFFILIATIONS

Harvest is not affiliated with a broker-dealer.

B. FUTURES/COMMODITIES FIRM AFFILIATION

Harvest is not affiliated with a futures or commodities broker.

C. OTHER INDUSTRY AFFILIATIONS

Many of Harvest's investment adviser representatives are licensed independent insurance agents. Through their licenses, they may sell insurance products to the firm's clients. This causes a conflict of interest because they receive a commission for this service, which is separate from the fees outlined in Item 5 above. Harvest attempts to mitigate the conflict of interest to the best of its ability by placing the client's interests ahead of its own through its fiduciary duty. Also, it is the Harvest's policy that recommended insurance products do not have to be purchased through an investment adviser representative.

Harvest's investment adviser representative, George Elias, also owns a professional accounting firm, Global Tax Consulting, LLC. Mr. Elias may recommend these services to Harvest's clients. With the ability to work as a client's certified public accountant and investment adviser representative, this could be viewed as a conflict of interest because each service pays a separate fee or commission from the fees outlined in Item 5 above. However, Mr. Elias attempts to mitigate any conflicts of interest to the best of his ability by placing the Clients interests ahead of his own and through the implementation of policies and procedures that address the conflict.

D. SELECTION AND MONITORING OF THIRD PARTY INVESTMENT ADVISERS

Harvest may use the services of unaffiliated Third Party Investment Advisers ("TPA") to assist in managing a client's account. Harvest will disclose the use of an unaffiliated TPA when used in a client's account. Typically, the unaffiliated TPA receives a portion of our fee. In the event that the unaffiliated TPA charges a separate fee, Harvest will disclose this to the client. Please see Item 8.A for information about Harvest's due diligence process on the TPAs.

11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION

Harvest's Code of Ethics establishes ideals for ethical conduct upon fundamental principles of openness, integrity, honesty, and trust. Harvest will provide a copy of the Code of Ethics to any client or prospective client upon request.

Harvest's Code of Ethics covers all supervised persons and it describes our high standard of business conduct and fiduciary duty to clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. The owners and all other supervised persons who work for Harvest must acknowledge the terms of the Code of Ethics annually, or as amended.

B. MATERIAL INTEREST IN SECURITIES

Harvest does not have a material interest in any securities.

C. INVESTING IN AND RECOMMENDING THE SAME SECURITIES

On occasion, Harvest's owner and representatives may buy or sell for their own individual investment accounts securities that are the same as, similar to, or different from those that they recommend to their clients. Differences can arise due to variations in personal goals, investment horizons, risk tolerance, and the timing of purchases and sales. Their ability to buy and sell securities for their own individual accounts and also to recommend to clients securities that are the same as, similar to, or different from those they buy and sell for their own accounts is a conflict of interest. Harvest's policy is to mitigate the conflict of interest to the best of its ability through the enactment of its Code of Ethics, trading policies, and its fiduciary responsibilities. The trading policies include disclosing to a client that the related person owns the same security,

attempting to place the client's trade ahead of all proprietary trades, and prohibiting of trading against a client's investment. Harvest is aware of its fiduciary duty to its clients and the prohibitions against the use of any insider information. Records of individual trading activities will be kept on the premises, and are available to regulators to review on the premises.

12. BROKERAGE PRACTICES

A. RECOMMENDATION CRITERIA

Harvest recommends the use of Fidelity Investments ("Fidelity"), which is an independent and unaffiliated SEC-registered broker-dealer. Fidelity offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from Fidelity through its participation in the program. (Please see the disclosure under Item 14 below.)

Some of the primary considerations in determining reasonableness of commissions are: rates charged by other brokers that provide clearing or custody services for registered investment advisers; reputation and financial strength; breadth and depth of available products, with an important factor being the broker's no-transaction-fee mutual fund universe; accuracy with which transactions are processed; and, customer service responsiveness. Harvest periodically evaluates the foregoing factors, and while it may conclude based on its review that commission rates paid by clients are reasonable, lower commissions may be available from other brokers or in conjunction with retail (non-advisory) accounts, and certain mutual funds that carry a transaction fee may be available on a no-transaction-fee basis from other brokers or directly from the fund company.

i. RESEARCH AND SOFT DOLLARS

"Soft dollars" are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to a particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to pay for these types of services. Harvest does not receive some soft dollar benefits from Fidelity.

ii. BROKERAGE FOR CLIENT REFERRALS

Harvest does not receive client referrals or any other incentive from any broker-dealer or custodian.

iii. DIRECTED BROKERAGE

Some clients may direct the firm to use a specific broker-dealer to execute securities transactions for their accounts. When so directed, Harvest may not be able to effectively achieve best execution on clients' transactions.

B. TRADE AGGREGATION

Harvest may aggregate orders with respect to the same security purchased for different clients. When orders are aggregated, each participating account receives the average share price for the transaction and bears a proportionate share of all transaction costs and based upon each account's participation in the transaction. Clients participating in block trading may include proprietary or

related accounts. Such accounts are treated as client accounts and are neither given preferential nor inferior treatment versus other client accounts. Allocations of orders among client accounts must be made in a fair and equitable manner.

13. REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

Managed accounts are reviewed by Harvest's owner, Kyle Mills on a monthly basis. Financial planning accounts are reviewed annually by the investment adviser representative who created the plan.

B. OTHER REVIEWS

Additional reviews may be conducted periodically depending on market conditions, economic or political events, or by changes in a client's financial situation (such as retirement, termination of employment, physical move or inheritance).

C. REPORTS

Financial planning clients may receive a written report in the form of a financial plan. Portfolio Management client receive at least quarterly statements from their account's custodian.

14. CLIENT REFERRALS AND OTHER COMPENSATION

A. OTHER COMPENSATION

Harvest does not receive any additional compensation for providing investment advice.

B. CLIENT REFERRALS

Harvest does not pay for client referrals or use solicitors.

15. CUSTODY

All client funds, securities and accounts are held at third-party custodians. Harvest does not take possession of a client's funds, securities or accounts. However, portfolio management client will be asked to authorize the firm with the ability to deduct its fees directly from the client's account. The client's custodian will also send a quarterly account statement, indicating the amount of fees withdrawn from the client's Account. Harvest urges clients to carefully review their statements and notify the firm of any discrepancies as soon as possible.

16. INVESTMENT DISCRETION

Harvest offers discretionary investment management services. The discretionary investment management is granted when a client signs an investment management agreement. The investment management agreement contains a limited power of attorney that allows the firm to select the securities to be bought and sold and the amount of securities to be bought and sold in the client's account. It also allows the firm to place each such trade without the client's prior approval. In all cases, however, such discretion is to be exercised in a manner consistent with

the stated investment objectives for the particular client account, and any other investment policies, limitation or restrictions.

17. VOTING CLIENT SECURITIES

Harvest will not be responsible for responding to proxies that are solicited with respect to securities held in clients' accounts. Proxy solicitation materials will be forwarded to clients for response and voting. In the event a client has a question about a proxy solicitation, the client should contact the issuing company or their investment adviser representative.

18. FINANCIAL INFORMATION

A. BALANCE SHEET

Harvest does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, this section is not applicable.

B. FINANCIAL CONDITION

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the Advisers financial condition. Harvest has no financial commitment that impairs its ability to service its clients.

C. BANKRUPTCY

Harvest has not been the subject of a bankruptcy proceeding.