

# MYeCFO, LLC d/b/a MYeCFO Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of MYeCFO, LLC. If you have any questions about the contents of this brochure, please contact us at (650) 231-4609 or by email at: [advisors@myecfo.com](mailto:advisors@myecfo.com). 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 MYeCFO, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). MYeCFO, LLC's CRD number is: 166919*

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*Registration does not imply a certain level of skill or training.*

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## **Item 2: Material Changes**

None.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

MYeCFO, LLC is a Limited Liability Company organized in the state of California. The firm was formed in January of 2013, and the principal owners are Martin Raul Curiel and Michael Robert Munson.

### B. Types of Advisory Services

MYeCFO, LLC (hereinafter "MYeCFO") offers the following services to advisory clients:

#### *Full-Service Consulting Services*

The MYeCFO team provides comprehensive advisory services across the areas of investments, taxes, and wealth management.

#### **Investments:**

MYeCFO offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. MYeCFO creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- |                       |                                |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy   |
| • Asset allocation    | • Asset selection              |
| • Risk tolerance      | • Regular portfolio monitoring |

MYeCFO evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

MYeCFO offers both discretionary and non-discretionary investment services:

#### **Discretionary Investment Management**

Clients engage MYeCFO to handle all aspects of their investment portfolio – asset allocation, security selection, execution, performance monitoring, and rebalancing. Clients give MYeCFO full authority to execute a particular investment plan according to their stated guidelines and constraints, which we can help define. We use a third-party custodian such as Charles Schwab or other financial institution that the client designates. MYeCFO does not hold client assets directly.

#### **Non-Discretionary Investment Management**

Clients can also hire MYeCFO for general investment consulting advice and recommendations without execution authority. We serve as a sounding board and objective third-party to help the

client make the most informed decision regarding investment strategy. Although the ultimate decision is made by the client, we may be asked to implement the client's requests.

### **TAX STRATEGY:**

MYeCFO works closely with our client's tax accountants to design and implement cost saving strategies, such as:

- Prepare tax documents and file tax returns on behalf of clients
- Providing an additional review and opinion related to the filing of all state and federal tax Returns  
Maximizing investment asset location efficiency
- Designing and implementing tax loss harvesting strategies
- Recommending tax efficient investment vehicles and financial products
- Advising on effective charitable contributions

MYeCFO clients leverage our partnerships with numerous tax professionals, including CPAs and Estate Attorneys, to execute specialized services. In addition, the Principals are registered to prepare taxes in the State of California as of January 1, 2017 and may sign off on returns from time to time.

### **WEALTH MANAGEMENT:**

MYeCFO helps clients execute and manage any personal finance issue that he/she faces. A client may provide MYeCFO with a list of prioritized projects, which we then help take from beginning to end. We will accomplish the project ourselves and/or leverage a vetted network of external advisors, including Bankers, Estate Attorneys, Insurance Specialists, Real estate Agents, Brokers, Education Consultants, CPAs, and Career Coaches. We don't take commission, referral fees, or other remuneration from our partners.

#### ***General Consulting Engagements***

From time to time and for convenience purposes, our clients might engage us for specific project such as creating a financial plan, bookkeeping and accounting services, educational workshops, and other related projects. The fees for these engagements are separate from asset based fees.

#### ***Services Limited to Specific Types of Investments***

MYeCFO generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, REITs, insurance products including annuities, and government securities. MYeCFO may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

MYeCFO offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent MYeCFO from properly servicing the client account, or if the restrictions would require MYeCFO to deviate from its standard suite of services, MYeCFO reserves the right to end the relationship.

#### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. MYeCFO does not participate in any wrap fee programs.

#### **E. Amounts Under Management**

MYeCFO manages approximately \$139.8 Million as of 12/31/2021.

### **Item 5: Fees and Compensation**

#### **A. Fee Schedule**

##### ***Investment Supervisory Services Fees***

Standard fee schedule is as follows.

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
<b>\$1- \$750,000</b>	<b>1.25%</b>
<b>\$750,001- \$1,500,000</b>	<b>1.00%</b>
<b>\$1,500,001 - \$3,000,000</b>	<b>0.90%</b>
<b>Above \$3,000,000</b>	<b>0.75%</b>



All fees are negotiable and may go as high as 1.5%/year.

MYeCFO does not have an account minimum, however, there is a minimum target annual fee of \$10,000. These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in arrears, and clients may terminate their contracts with thirty days' written notice.

Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization. Lower fees for comparable services may be available from other sources.

For all fees being withdrawn directly from client accounts, MYeCFO will provide a statement to the client showing the amount of the fee being deducted, the value of the client's assets upon which this fee was based, and the specific manner in which the fee was calculated. It is the client's responsibility to verify the accuracy of the fee calculation, as the custodian will not do so, and client should review every statement.

When fees are deducted from client accounts at the custodian, MYeCFO will provide a statement to the client showing the amount of the fee, the value of the client's assets upon which the fee was based, and the specific manner in which the fee was calculated. The client is responsible for verifying the accuracy of the fee calculation as the custodian will not do so.

## ***General Consulting Engagements***

### ***Hourly Fees***

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is between \$250 and \$500. Updated fees can be found here: [myecfo.com/hourly](http://myecfo.com/hourly). The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

## **B. Payment of Fees**

### ***Payment of Investment Supervisory Fees***

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in arrears.

Advisory fees may also be invoiced and billed directly to the client quarterly in arrears. The fees may also be automatically withdrawn for the convenience of the client.

Clients may select the method in which they are billed.

### ***Payment of Financial Planning Fees***

Hourly and consulting engagement fees are paid via check or credit card in arrears upon completion. Because fees are charged in arrears, no refund is necessary.

### **C. Clients Are Responsible For Third Party Fees**

Clients are responsible for the payment of all third-party fees (i.e., custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by MYeCFO. Please see Item 12 of this brochure regarding broker/custodian.

### **D. Prepayment of Fees**

MYeCFO collects its fees in arrears. It does not collect fees in advance.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither MYeCFO nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

MYeCFO does accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

MYeCFO generally provides investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

- ❖ Businesses
- ❖ Non-Profits

### ***Minimum Account Size***

There is no account minimum.

## **Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss**

### **A. Methods of Analysis and Investment Strategies**

#### ***Methods of Analysis***

MYeCFO's methods of analysis include fundamental analysis and technical analysis.

*Fundamental analysis* involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

*Technical analysis* involves the analysis of past market data; primarily price and volume.

#### ***Investment Strategies***

MYeCFO uses long term trading, short term trading, short sales, margin transactions, and options writing (including covered options, uncovered options, or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **B. Material Risks Involved**

#### ***Methods of Analysis***

*Fundamental analysis* concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

*Technical analysis* attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

#### ***Investment Strategies***

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

MYeCFO generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize short sales, margin transactions, and options writing. Short sales, margin transactions, and options writing generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned above).

**Equity** investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Treasury Inflation Protected/Inflation Linked Bonds:** The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Fixed Income** is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

**Debt securities** carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

**Stocks & Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy).

**Real Estate** funds face several kinds of risk that are inherent in this sector of the market. Liquidity risk, market risk and interest rate risk are just some of the factors that can influence the gain or loss that is passed on to the investor. Liquidity and market risk

tend to have a greater effect on funds that are more growth-oriented, as the sale of appreciated properties depends upon market demand. Conversely, interest rate risk impacts the amount of dividend income that is paid by income-oriented funds.

**REITs** have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

**Precious Metal ETFs** (Gold, Silver, Palladium Bullion backed “electronic shares” not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability and inflation.

**Short sales** risks include the upward trend of the market and the infinite possibility of loss.

**Margin transactions** use leverage that is borrowed from a brokerage firm as collateral.

**Options writing** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither MYeCFO nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither MYeCFO nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Michael Robert Munson is a Portfolio Manager at Denali Advisors. Clients are in no way required to implement the plan through any representative of MYeCFO, LLC in such individual's outside capacities. MYeCFO, LLC always acts in the best interest of the client.

All material conflicts of interest Under Section 260.238 (k) of the Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonable expected to impair the rendering of unbiased and objective advice.

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

MYeCFO does not utilize nor select other advisers or third party managers. All assets are managed by MYeCFO management.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **A. Code of Ethics**

MYeCFO has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

## **B. Recommendations Involving Material Financial Interests**

MYeCFO does not recommend that clients buy or sell any security in which a related person to MYeCFO or MYeCFO has a material financial interest.

## **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of MYeCFO may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of MYeCFO to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. MYeCFO will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

## **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of MYeCFO may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of MYeCFO to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. MYeCFO will always transact client's transactions before its own when similar securities are being bought or sold.

# **Item 12: Brokerage Practices**

## **A. Factors Used to Select Custodians and/or Broker/Dealers**

The Custodian, Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD # 5393), was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. MYeCFO will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian. E\*Trade is a secondary custodian that was chosen primarily for the convenience of clients using it already.

### ***1. Research and Other Soft-Dollar Benefits***

MYeCFO receives no research, product, or services other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

### ***2. Brokerage for Client Referrals***

MYeCFO receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

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### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

MYeCFO allows clients to direct brokerage; however, MYeCFO may recommend custodians. MYeCFO may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage MYeCFO may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

#### **B. Aggregating (Block) Trading for Multiple Client Accounts**

MYeCFO maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing MYeCFO the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

## **Item 13: Reviews of Accounts**

#### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed at least monthly only by Michael Munson, Managing Member. Martin Raul Curiel is the Chief Compliance Officer and is instructed to review clients' accounts with regard to clients' respective investment policies and risk tolerance levels. All accounts at MYeCFO are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Martin Raul Curiel, Managing Member. There is only one level of review and that is the total review conducted to create the financial plan.

#### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).



### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

MYeCFO does not receive any economic benefit, directly or indirectly from any third party for advice rendered to MYeCFO clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

MYeCFO plans to hire third party solicitors to market the firm's services and will compensate these individuals. All compensation arrangements will be disclosed to the clients in advance in accordance with securities regulations. Currently, MYeCFO does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

MYeCFO, with client written authority, has limited custody of client's assets through direct fee deduction of MYeCFO's fees only. If the client chooses to be billed directly the custodian, MYeCFO would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

For those client accounts where MYeCFO will have investment discretion, the client has given MYeCFO written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides MYeCFO discretionary authority via a discretionary investment management clause in the Investment Advisory Contract and/or a limited power of attorney clause in the contract between the client and the custodian.

## **Item 17: Voting Client Securities (Proxy Voting)**

MYeCFO will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

MYeCFO does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither MYeCFO nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

MYeCFO has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

MYeCFO currently has two management persons/executive officers; Martin Raul Curiel and Michael Munson. Martin Raul Curiel and Michael Munson's education and business background can be found on the Supplemental ADV Part 2B form.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Martin Raul Curiel and Michael Munson's other business activities can be found on the Supplemental ADV Part 2B form.

### **C. How Performance-based Fees are Calculated and Degree of Risk to Clients**

MYeCFO does accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

**D. Material Disciplinary Disclosures for Management Persons of this Firm**

No management person at MYeCFO or MYeCFO has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

Neither MYeCFO, nor its management persons, has any relationship or arrangement with issuers of securities.