

## **ITEM 1: COVER PAGE**

# **HARBORFRONT FINANCIAL GROUP**

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October 28, 2024

## **FIRM BROCHURE (FORM ADV PART 2A)**

This brochure provides information about the qualifications and business practices of Harborfront Financial Group. If you have any questions about the contents of this brochure, please contact us at the phone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration (e.g., “registered investment advisor”) does not imply a certain level of skill or training.

Additional information about Harborfront Financial Group (CRD# 331763) also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2: MATERIAL CHANGES**

Pursuant to SEC rules, Harborfront Financial Group will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the Firm's fiscal year end, December 31. This means that if there were any material changes over the past year, clients will receive a summary of those changes no later than April 30. At that time, Harborfront Financial Group will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for Harborfront Financial Group at any time by contacting their investment advisor representative.

Since our firm's initial filing on August 20, 2024, the following items were amended:

- We updated our firm's name to Harborfront Financial Group in Item 1, Item 2, and Item 4.
- We included information about wrap fee programs in Item 4 and Item 5.

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## ITEM 4: ADVISORY BUSINESS

### *Firm Description*

Harborfront Financial Group (“Harborfront” or the “Firm”) was founded during April 2024, in the State of Michigan and applied to become an investment adviser on August 20, 2024.

The Chief Compliance Officer of Harborfront is Raymond Janish (CRD# 2690186), who is also a member and ownership person. Elizabeth De Kuiper (CRD# 3260861), Michael Custer (CRD# 6875701), and Autumn Wittlieff (CRD# 7476234) are also members and owners of Harborfront.

### *Types of Advisory Services*

Harborfront provides investment advisory services through investment management, financial planning, and other related services. We offer these services to clients or prospective clients (“Client” or “Clients”). Prior to providing any investment advisory services, Harborfront requires a written financial services agreement (“FSA”) be executed by the Client. The FSA will outline the services available to the Client and the fees the Client will incur.

Harborfront may provide advisory services through certain programs sponsored by LPL Financial LLC (“LPL”), a registered investment advisor and broker-dealer. Below is a brief description of each LPL advisory program available to Harborfront. For more information regarding the LPL programs, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs please see the program account packet (which includes the account agreement and LPL Form ADV program brochure) and the Form ADV, Part 2A of LPL or the applicable program.

### *LPL Advisory Programs*

#### **Manager Access Select Program**

Manager Access Select (“MAS”) offers clients the ability to participate in the Separately Managed Account Platform (the “SMA Platform”) or the Model Portfolio Platform (the “MP Platform”). In the SMA Platform, Harborfront will assist client in identifying a third party portfolio manager (SMA Portfolio Manager) from a list of SMA Portfolio Managers made available by LPL, and the SMA Portfolio Manager manages client’s assets on a discretionary basis. Harborfront will provide initial and ongoing assistance regarding the SMA Portfolio Manager selection process. In the MP Platform, clients authorize LPL to direct the investment and reinvestment of the assets in their accounts, in accordance with the selected model portfolio provided by LPL’s Research Department or a third-party investment advisor.

A minimum account value of \$50,000 is required for Manager Access Select, however, in certain instances, the minimum account size may be lower or higher.

### **Optimum Market Portfolios Program (OMP)**

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds shares. Under OMP, client will authorize LPL on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. Harborfront will assist the client in determining the suitability of OMP for the client and assist the client in setting an appropriate investment objective. Harborfront will have discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client's investment objective. LPL will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL will also have authority to rebalance the account.

A minimum account value of \$10,000 is required for OMP. In certain instances, LPL will permit a lower minimum account size.

### **Personal Wealth Portfolios Program (PWP)**

PWP offers clients an asset management account using asset allocation model portfolios designed by LPL. Advisor will have discretion for selecting the asset allocation model portfolio based on client's investment objective. Advisor will also have discretion for selecting third party money managers (PWP Advisors), mutual funds and ETFs within each asset class of the model portfolio. LPL will act as the overlay portfolio manager on all PWP accounts and will be authorized to purchase and sell mutual funds, ETFs and equity and fixed income securities on a discretionary basis.

A minimum account value of \$250,000 is required for PWP. In certain instances, LPL will permit a lower minimum account size.

### **Model Wealth Portfolios Program (MWP)**

MWP offers clients a professionally managed mutual fund asset allocation program. Harborfront will obtain the necessary financial data from the client, assist the client in determining the suitability of the MWP program and assist the client in setting an appropriate investment objective. Harborfront will initiate the steps necessary to open an MWP account and have discretion to select a model portfolio designed by LPL's Research Department consistent with the client's stated investment objective. LPL's Research Department, a third-party portfolio strategist and/or Advisor, through its IAR, may act as a portfolio strategist responsible for selecting the mutual funds or ETFs within a model portfolio and for making changes to the mutual funds or ETFs selected.

The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds and ETFs and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for MWP accounts.

MWP requires a minimum asset value for a program account to be managed. The minimums vary depending on the portfolio(s) selected and the account's allocation amongst portfolios. The lowest

minimum for a portfolio is \$10,000. In certain instances, a lower minimum for a portfolio is permitted.

### **Small Market Solution (SMS) Program**

Under SMS, LPL Research (a team of investment professionals within LPL) creates and maintains a series of different investment menus (“Investment Menus”) consisting of a mix of different asset classes and investment vehicles (“investment options”) for clients that sponsor and maintain participant-directed defined contribution plans (“Plan Sponsors”). The Plan Sponsor is responsible for selecting the Investment Menu that it believes is appropriate based on the demographics and other characteristics of the Plan and its participants. LPL Research is responsible for the selection and monitoring of the investment options made available through Investment Menus. The investment options that are offered through SMS are limited to the specific investments available through the record keeper that the Plan Sponsor selects. The Plan Sponsor may only select an Investment Menu in its entirety and does not have the option to remove or substitute an investment option.

In addition to the services described above, Plan Sponsor may also select from a number of consulting services available under SMS that are provided by Harborfront. These consulting services may include, but are not limited to: general education, and support regarding the Plan and the investment options selected by Plan Sponsor; assistance regarding the selection of, and ongoing relationship management for, record keepers and other third-party vendors; Plan participant enrollment support; and participant-level education regarding investment in the Plan. These consulting services do not include any individualized investment advice to the Plan Sponsor or Plan participants with respect to Plan assets.

### **Guided Wealth Portfolios (GWP)**

GWP offers clients the ability to participate in a centrally managed, algorithm-based investment program, which is made available to users and clients through a web-based, interactive account management portal (“Investor Portal”). Investment recommendations to buy and sell exchange-traded funds and open-end mutual funds are generated through proprietary, automated, computer algorithms (collectively, the “Algorithm”) of FutureAdvisor, Inc. (“FutureAdvisor”), based upon model portfolios constructed by LPL and selected for the account as described below (such model portfolio selected for the account, the “Model Portfolio”). Communications concerning GWP are intended to occur primarily through electronic means (including but not limited to, through email communications or through the Investor Portal), although Harborfront will be available to discuss investment strategies, objectives or the account in general in person or via telephone.

A preview of the Program (the “Educational Tool”) is provided for a period of up to forty-five (45) days to help users determine whether they would like to become advisory clients and receive ongoing financial advice from LPL, FutureAdvisor and Harborfront by enrolling in the advisory service (the “Managed Service”). The Educational Tool and Managed Service are described in more detail in the GWP Program Brochure. Users of the Educational Tool are not considered to be advisory clients of LPL, FutureAdvisor or Harborfront, do not enter into an advisory agreement

with LPL, FutureAdvisor or Harborfront, do not receive ongoing investment advice or supervision of their assets, and do not receive any trading services.

A minimum account value of \$5,000 is required to enroll in the Managed Service.

### ***SWM***

Although clients do not pay a transaction charge for transactions in a SWM account, clients should be aware that Harborfront pays LPL transaction charges for those transactions. The transaction charges paid by Harborfront vary based on the type of transaction (e.g., mutual fund, equity or ETF) and for mutual funds based on whether or not the mutual fund pays 12b-1 fees and/or recordkeeping fees to LPL. Transaction charges paid by the Advisor for equities and ETFs are \$9. For mutual funds, the transaction charges range from \$0 to \$26.50. Because Harborfront pays the transaction charges in SWM accounts, there is a conflict of interest in cases where the mutual fund is offered at both \$0 and \$26.50. Clients should understand that the cost to Advisor of transaction charges may be a factor that Harborfront considers when deciding which securities to select and how frequently to place transactions in a SWM account.

In many instances, LPL makes available mutual funds in a SWM account that offer various classes of shares, including shares designated as Class A Shares and shares designed for advisory programs, which can be titled, for example, as “Class I,” “institutional,” “investor,” “retail,” “service,” “administrative” or “platform” share classes (“Platform Shares”). The Platform Share class offered for a particular mutual fund in SWM in many cases will not be the least expensive share class that the mutual fund makes available, and was selected by LPL in certain cases because the share class pays LPL compensation for the administrative and recordkeeping services LPL provides to the mutual fund. Client should understand that another financial services firm may offer the same mutual fund at a lower overall cost to the investor than is available through SWM. In other instances, a mutual fund may offer only Class A Shares, but another similar mutual fund may be available that offers Platform Shares. Class A Shares typically pay LPL a 12b-1 fee for providing shareholder services, distribution, and marketing expenses (“brokerage-related services”) to the mutual funds. Platform Shares generally are not subject to 12b-1 fees. As a result of the different expenses of the mutual fund share classes, it is generally more expensive for a client to own Class A Shares than Platform Shares. An investor in Platform Shares will pay lower fees over time and keep more of his or her investment returns than an investor who holds Class A Shares of the same fund.

Harborfront has a financial incentive to recommend Class A Shares in cases where both Class A and Platform Shares are available. This is a conflict of interest which might incline Harborfront, consciously or unconsciously, to render advice that is not disinterested. Although the client will not be charged a transaction charge for transactions, Advisor pays LPL a per transaction charge for mutual fund purchases and sales in the account. Harborfront generally does not pay transaction charges for Class A Share mutual fund transactions accounts, but generally does pay transaction charges for Platform Share mutual fund transactions. The cost to Harborfront of transaction charges generally may be a factor Advisor considers when deciding which securities to select and

whether or not to place transactions in the account.

The lack of transaction charges to Harborfront for Class A Share purchases and sales, together with the fact that Platform Shares generally are less expensive for a client to own, presents a significant conflict of interest between Harborfront and the client. In short, it costs Harborfront less to recommend and select Class A share mutual funds than Platform shares, but Platform shares will generally outperform Class A mutual fund shares on the basis of internal cost structure alone. Clients should understand this conflict and consider the additional indirect expenses borne as a result of the mutual fund fees when negotiating and discussing with your Advisor the advisory fee for management of an account.

### ***Financial Planning***

Financial planning services will typically involve working with Clients to prepare and monitor a financial plan using financial planning spreadsheets and software. Financial planning may encompass one or more of the following areas: Investment Planning, Retirement Accumulation Planning, Retirement Income Planning, Goals Planning, Education Planning, Social Security Planning, Debt Analysis, Insurance Analysis, Tax Planning, Business Planning, and Estate and Inheritance Planning.

Financial planning usually includes general recommendations for a course of activity or specific actions to be taken by the Clients. Implementation of the recommendations will be at the discretion of the Client. Financial planning is typically an ongoing part of the Client relationship.

Because some of Harborfront's associated persons are licensed insurance agents, recommending insurance products in a financial plan constitutes a *conflict of interest*. Clients are under *no obligation to act* on Harborfront's or its associated person's recommendation. If a Client elects to act on any of the recommendations, the client is under *no obligation to effect the transaction* through Harborfront or its associated person.

### ***Services Tailored to Clients' Needs***

Harborfront offers individualized advisory services to Clients as part of our portfolio management services. Clients may request that Harborfront refrain from investing in particular securities or certain types of securities. Clients must provide these restrictions to Harborfront in writing.

A review of the information provided by the Client regarding the Client's current financial situation, goals, and risk tolerances will be performed and advice will be provided that is in line with available information.

### ***Wrap Fee Programs***

All LPL Advisory Programs managed by Harborfront are wrap fee programs sponsored by LPL. A wrap fee program generally involves an investment account where Client is charged a single, bundled, or "wrap" fee for investment advice, brokerage services, administrative expenses, and other fees and expenses. The defining feature of a wrap fee program is that they offer bundled



investment management and brokerage services for one fee. There is typically a "sponsor" for a wrap fee program, which is LPL, who sponsors, organizes, or administers the program or selects, or provides advice to Clients regarding the selection of, other investment advisers in the program.

Because of the nature of a wrap fee program, the wrap fee program Client may pay more or less than if the Client had compensated Harborfront outside of the wrap fee program. For example, if a Client's account is rarely traded, the transaction fees the client would have paid would be minimal, thus limiting the benefits of "wrapping" management fees and transaction fees. Because Harborfront will be compensated the same amount whether an account participating in the wrap program is traded or not, we have a financial incentive to avoid trading the account. This creates a conflict of interest between Harborfront and its wrap Clients. Harborfront attempts to mitigate this conflict by requiring that the firm's employees acknowledge their fiduciary duty to place client interests ahead of their own.

Harborfront will receive no additional compensation for offering the wrap fee program.

### ***Assets Under Management***

As of August 20, 2024, Harborfront has the following assets under management:

Discretionary assets:	\$0.00
Non-discretionary assets:	\$0.00

## **ITEM 5: FEES AND COMPENSATION**

### ***Fees for LPL Advisory Programs***

The account fee charged to the client for each LPL advisory program is negotiable, subject to the following maximum account fees:

Manager Access Select	3.0%*
OMP	2.5%
PWP	2.5%
SWM	2.5%
MWP	2.65%**
SMS	0.95%***
GWP	1.35%****

\* The maximum Manager Access Select account fee for new accounts was reduced to 2.5% effective July 3, 2017.

\*\* The MWP account fee consists of an LPL program fee, a strategist fee (if applicable) and an advisor fee of up to 2.00%. Accounts remaining under the legacy fee structure may be charged one aggregate account fee, for which the maximum account fee is 2.50%. See the MWP program brochure for more information

**\*\*** The SMS fee consists of an LPL program fee of 0.20% (subject to a minimum program fee of \$250), and an advisor fee of up to 0.75%.

**\*\*\*** GWP Managed Service clients are charged an account fee consisting of an LPL program fee of 0.35% and an advisor fee of up to 1.00%. In the future, a strategist fee may apply. However, LPL Research currently serves as the sole portfolio strategist and does not charge a fee for its services. FutureAdvisor is compensated directly by LPL for its services, including the Algorithm and related software, through an annual sub-advisory fee (tiered based on assets under management by FutureAdvisor, at a rate ranging from 0.10% to 0.17%). As each asset tier is reached, LPL's share of the compensation shall increase and clients will not benefit from such asset tiers.

GWP Educational Tool provides access to sample recommendations at no charge to users. However, if users decide to implement sample recommendations by executing trades, they will be charged fees, commissions, or expenses by the applicable broker or adviser, as well as underlying investment fees and expenses.

Account fees are payable quarterly in advance, except that the SMS fee is paid in arrears on the frequency agreed to between client and Harborfront.

Excluding SMS and GWP, LPL serves as program sponsor, investment advisor and broker-dealer for the LPL advisory programs. In the Managed Service of GWP, LPL is appointed by each client as custodian of account assets and broker-dealer with respect to processing securities transactions for the accounts. In general, FutureAdvisor, in its capacity as investment advisor, will submit transactions through LPL; however, FutureAdvisor may choose to execute transactions through a broker-dealer other than LPL, subject to its duty to seek to achieve best execution. When securities transactions are effected through LPL, there are no brokerage commissions charged to the account. If FutureAdvisor chooses to execute a transaction through a broker-dealer other than LPL, the execution price may include a commission or fee imposed by the executing broker-dealer. In evaluating whether to execute a trade through a broker-dealer other than LPL, Future Advisor will consider the fact that the account will not be charged a commission if the transaction is effected through LPL.

Harborfront and LPL may share in the account fee and other fees associated with program accounts. Associated persons of Harborfront may also be registered representatives of LPL. Under SMS, LPL serves as investment advisor but not the broker-dealer. Harborfront and LPL may share in the advisory portion of the SMS fee.

### **Certain Conflicts of Interest**

Harborfront receives compensation as a result of a client's participation in an LPL program. Depending on, among other things, the type and size of the account, type of securities held in the account, changes in its value over time, the ability to negotiate fees or commissions, the historical or expected size or number of transactions, and the number and range of supplementary advisory and client-related services provided to the client, the amount of this compensation may be more or less than what the Harborfront would receive if the client participated in other programs, whether

through LPL or another sponsor, or paid separately for investment advice, brokerage and other services.

The account fee may be higher than the fees charged by other investment advisors for similar services. For instance, FutureAdvisor offers direct-to-consumer services similar to GWP. Therefore, clients could generally pay a lower advisory fee for algorithm-driven, automated (“robo”) investment advisory services through FutureAdvisor or other robo providers. However, clients using such direct robo services will forgo opportunities to utilize LPL-constructed model portfolios or to work directly with a financial advisor.

Clients should consider the level and complexity of the advisory services to be provided when negotiating the account fee (or the advisor fee portion of the account fee, as applicable) with Harborfront. With regard to accounts utilizing third-party portfolio managers under aggregate, all-in-one account fee structures (including MAS, PWP and the legacy MWP fee structure), because the portion of the account fee retained by Harborfront varies depending on the portfolio strategist fee associated with a portfolio, Harborfront has a financial incentive to select one portfolio instead of another portfolio.

Please refer to the relevant LPL Form ADV program brochure for a more detailed discussion of conflicts of interest.

Harborfront will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will Harborfront accept or maintain custody of a client’s funds or securities except for authorized fee deduction. The Client may contact the Custodian directly for disbursements, or account record changes, and may also do so in writing to the custodian. Harborfront may act at the client’s convenience to facilitate such written communications to the Custodian, provided that such action is not construed to be custody of client assets.

Clients may request to terminate their advisory contract with Harborfront, in whole or in part, by providing advance written notice. Upon termination, Harborfront shall be responsible for refunding any fees paid in advance on a pro-rata basis determined by the date of termination and any refund will be remitted to the Client through the Custodian.

Client’s advisory agreement with Harborfront is non-transferable without Client’s written approval.

### ***Fixed Fees***

Fixed fees are commensurate with asset-based fees and may be negotiated for investment services and are established as fixed fees where the intent of the Client is that fees are not variable automatically with changes in asset values on a quarterly basis. Generally, our firm charges a fixed fee that may range between \$100 and \$7,000 quarterly in arrears depending on the nature and complexity of the work. Fixed fee arrangements under the Client FSA are for a period of one year, at which time a new fee, whether fixed, or based on a percentage of assets under management, may be negotiated. Fixed fees may be deducted and invoiced in the same fashion as asset-based

fees for investment services. In instances where Harborfront cannot directly deduct such fees, then the firm accepts direct payment via credit card, check, and ACH transfer.

All fixed fees for services offered by Harborfront will be determined in advance based on the FSA between the Client and Harborfront and based on the information provided by the Client at that time.

All fixed fees are billed quarterly in arrears. Client shall be provided with an electronic invoice for services rendered during the preceding quarter.

### ***Fee Deduction Disclosure***

Where Harborfront deducts its management fee from client accounts utilizing a qualified custodian, the Firm is required to meet the following requirements.

- a. Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian;
- b. Harborfront must send the qualified custodian a written invoice detailing the fee amount to be deducted from the client account; and,
- c. Harborfront must have a reasonable basis, after due inquiry, for believing that the qualified custodian sends an account statement, at least quarterly, to each of your clients for which it maintains funds or securities, identifying the amount of funds and of each security in the account at the end of the period and setting forth all transactions in the account during that period.

### ***Third Party/ Custodian Fees***

Because all Clients are in a wrap fee program, they will have some or all of their transaction fees covered by Harborfront. Fees included in the wrap fee include transaction fees for the purchase or sale of securities, but do not include expenses related to the use of margin, wire transfer fees, the fees charged to shareholders of mutual funds or ETFs, mark-ups and mark-downs, spreads, odd-lot differentials, fees charged by regulatory agencies, and any transaction fees for securities trades executed by a broker-dealer other than LPL (“trading away”). Any fees due to another portfolio manager, if applicable will be paid by the Client.

Harborfront will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will the Firm accept or maintain custody of a client’s funds or securities except for authorized fee deduction. The Client may contact the Custodian directly for disbursements, or account record changes, and may also do so in writing to the custodian. The Firm may act at the client’s convenience to facilitate such written communications to the Custodian, provided that such action is not construed to be custody of client assets.

### ***Right of Cancellation***

In addition to the right to terminate an agreement pursuant to its terms, a client may cancel an agreement with Adviser within five (5) business days of first receiving a copy of this disclosure brochure and supplement without penalty or fee.

### ***Limitations due to LPL Licensing/Registration***

The individuals that are licensed as registered representatives of LPL Financial are subject to regulations that restrict them from conducting securities transactions away from LPL Financial without written authorization from LPL Financial. Clients should, therefore, be aware that for accounts where LPL Financial serves as the custodian, Harborfront is limited to offering services and investment vehicles that are approved by LPL Financial and may be prohibited from offering services and investment vehicles that may be available through other broker/dealers and custodians.

### ***Compensation for the Sale of Securities or Investment Products***

Associated persons of Harborfront maintain financial affiliated business as insurance agents. From time to time, they will offer clients advice or products from this activity. These practices represent conflicts of interest because they give representatives of Harborfront an incentive to recommend products based on the commission received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products. Clients are under no obligation to act on Harborfront's or its associated person's recommendation. If a Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Harborfront or the associated person.

## **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Harborfront does not charge or accept performance-based fees.

## **ITEM 7: TYPES OF CLIENTS**

Harborfront provides investment advice to many different types of clients. These clients generally include individuals, corporations, trusts and estates, charitable organizations, and other business entities.

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

Harborfront does not require any minimum amount of assets to open or maintain an account.

## ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### *Methods of Analysis*

Harborfront may use the following methods when considering investment strategies and recommendations.

#### Fundamental Analysis

A fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. Fundamental analysis attempts to determine the true value of a company or security by looking at all aspects of the company or security, including both tangible factors (e.g., machinery, buildings, land, etc.) and intangible factors (e.g., patents, trademarks, “brand” names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price with the aim of determining what sort of position to take with that security (e.g., if underpriced, the security should be bought; if overpriced the security should sold). Fundamental analysis uses real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for many types of securities.

#### Technical Analysis

A technical analysis is a method of evaluating securities that analyzes statistics generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value, but instead uses past market data and statistical tools to identify patterns that can suggest future activity. Historical performance of securities and the markets can indicate future performance.

#### Charting

Charting is a technical analysis that charts the patterns of stocks, bonds, and commodities to help determine buy and sell recommendations for clients. It is a way of gathering and processing price and volume information in a security by applying mathematical equations and plotting the resulting data onto graphs in order to predict future price movements. A graphical historical record assists the analyst in spotting the effect of key events on a security's price, its performance over a period of time, and whether it is trading near its high, near its low or in between. Chartists believe that recurring patterns of trading, commonly referred to as indicators, can help them forecast future price movements.

### Cyclical Review

A cyclical analysis assumes the market reacts in reoccurring patterns that can be identified and leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these reoccurring patterns, or cycles, affect the returns of a given investment, asset, or company. Cyclical analysis is a time-based assessment which incorporates past and present performance to determine future value. Cyclical analyses exist because the broad economy has been shown to move in cycles, from periods of peak performance to periods of low performance. The risks of this strategy are two-fold: (1) the markets do not always repeat cyclical patterns; and (2) if too many investors begin to implement this strategy, it changes the very cycles of which they are trying to take advantage.

### Economic Review

An economic analysis determines the economic environment over a certain time horizon. This involves following and updating historic economic data such as U.S. gross domestic product and consumer price index as well as monitoring key economic drivers such as employment, inflation, and money supply for the world's major economies.

### *Investment Strategies*

When implementing investment advice to clients, the Firm may employ a variety of strategies to best pursue the objectives of clients. Depending on market trends and conditions, Harborfront will employ any technique or strategy herein described, at the Firm's discretion and in the best interests of the client. The Firm does not recommend any particular security or type of security. Instead, the Firm makes recommendations to meet a particular client's financial objectives. There is inherent risk to any investment and clients may suffer loss of ALL OR PART of a principal investment.

### Long-Term Purchases

Long-term purchases are securities that are purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen changes in the company in which a client is invested or in the overall market. Long-term trading is designed to capture market rates of both return and risk. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Due to its nature, the long-term 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, and political/regulatory risk.

### Short-Term Purchases

Short-term purchases are securities that are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the

securities' short-term price fluctuations. Short-term trading generally holds greater risk. Frequent trading can affect investment performance due to increased brokerage fees and other transaction costs and taxes.

### Strategic Asset Allocation

Asset allocation is a combination of several different types of investments; typically, this includes stocks, bonds, and cash equivalents among various asset classes to achieve diversification. The objective of asset allocation is to manage risk and market exposure while still positioning a portfolio to meet financial objectives.

### ***Risk of Loss***

Investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee. Harborfront does not provide any representation or guarantee that the financial goals of clients will be achieved.

The potential return or gain and potential risk or loss of an investment varies, generally speaking, with the type of product invested in. Below is an overview of the types of products available on the market and the associated risks of each:

- General Risks.  
Investing in securities always involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. We also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.
- General Market Risk.  
Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.
- Common Stocks  
Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry changes. Such price fluctuations subject certain strategies to potential losses. During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.



- Portfolio Turnover Risk

High rates of portfolio turnover could lower the performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in short-term capital gains and under current tax law you would be taxed on short-term capital gains at ordinary income tax rates, if held in a taxable account.

- Non-Diversified Strategy Risk

Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

- Model Risk

Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. We may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions.

There is no guarantee any model will work under all market conditions. For this reason, we include model related results as part of our investment decision process, but we often weigh professional judgment more heavily in making trades or asset allocations.

- ETF Risks, including Net Asset Valuations and Tracking Error

An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by HARBORFRONT plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a Client's portfolio

performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

- Inflation, Currency, and Interest Rate Risks

Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by Harborfront may be affected by the risk that currency devaluations affect Client purchasing power.

- Liquidity Risk

Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established market of purchasers and sellers may be considered illiquid. Your investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert your investment to cash or other assets.

- Legislative and Tax Risk

Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/Securities. We do not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

- Concentration Risk

While Harborfront selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.

- Foreign Investing and Emerging Markets Risk

Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social, and economic developments affecting one or more foreign countries.

In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

- Information Security Risk

We may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisers. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability of us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

- Tax Risks

Tax laws and regulations applicable to an account with Harborfront may be subject to change and unanticipated tax liabilities may be incurred by an investor as a result of such changes. In addition, customers may experience adverse tax consequences from the early assignment of options purchased for a customer's account. Customers should consult their own tax advisers and counsel to determine the potential tax-related consequences of investing.

- Advisory Risk

There is no guarantee that our judgment or investment decisions on behalf of particular any account will necessarily produce the intended results. Our judgment may prove to be incorrect, and an account might not achieve her investment objectives. In addition, it is possible that we may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to accounts' custodians' software. Harborfront and its representatives are not responsible to any account for losses unless caused by Harborfront breaching our fiduciary duty.

- Dependence on Key Employees  
An accounts success depends, in part, upon the ability of our key professionals to achieve the targeted investment goals. The loss of any of these key personnel could adversely impact the ability to achieve such investment goals and objectives of the account.
- Restriction Risk.  
Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.

Harborfront does not primarily recommend a particular type of security.

## ITEM 9: DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of the advisory business or integrity of Harborfront's management.

Harborfront has no disciplinary disclosures. Management persons listed in Item 4 and in Schedule A from Part 1A of Form ADV have no disciplinary disclosures.

## ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

### *Registration as a Broker-Dealer or Broker/Dealer Representative*

Harborfront is not registered and does not intend to register as a broker-dealer. However, certain associated persons of the Harborfront are registered representatives of LPL Financial. As a result of this relationship, LPL Financial may have access to certain confidential information (e.g., financial information, investment objectives, transactions and holdings) about Harborfront's clients, even if client does not establish any account through LPL. If you would like a copy of the LPL Financial privacy policy, please contact a Harborfront representative.

### *Registration as a Futures Commission merchant, Commodity Pool Operator*

Harborfront and its management persons are not registered and do not have application pending to register, as a futures commission merchant, commodity pool operator/advisor.

### *Relationships Material to this Advisory Business and Possible Conflicts of Interest*

Certain representatives of Harborfront maintain financial affiliated business as insurance agents. From time to time, they may offer clients advice or products from this activity. These practices

represent conflicts of interest because it gives representatives of Harborfront an incentive to recommend products based on the commission received. This conflict is mitigated by disclosures, policies and procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

### ***Selection of other Advisors***

Harborfront does not utilize nor select other advisers or third-party managers.

## **ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### ***Fiduciary Status***

According to Michigan and federal law, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. Harborfront and its representatives have a fiduciary duty to all clients.

Harborfront and its representatives' fiduciary duty to clients is considered the core underlying principle for Harborfront's Code of Ethics and represents the expected basis for all representatives' dealings with clients. Harborfront has the responsibility to ensure that the interests of clients are placed ahead of it or its representatives' own investment interest. All representatives will conduct business in an honest, ethical, and fair manner. All representatives will always comply with all federal and state securities laws. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to services being conducted. All representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the representatives' duty of complete loyalty to their clients.

Harborfront and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. Harborfront has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser.

### ***Description of Our Code of Ethics***

Harborfront strives to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for associated persons of Harborfront. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All associated persons of Harborfront are expected to adhere strictly to these guidelines. Harborfront's associated persons are also required to report any violations of our Code of Ethics.

Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

***Personal Trading Practices***

In addition, the Code of Ethics governs personal trading by each employee of Harborfront deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Harborfront are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates.

Harborfront collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve potential conflicts of interest. Harborfront's Code of Ethics is available upon request.

***Participation or Interest in Client Transactions***

Neither Harborfront nor any of our management persons have a material relationship or arrangement with any issuer of securities. Neither Harborfront nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

## **ITEM 12: BROKERAGE PRACTICES**

***Selection and Recommendation***

Harborfront generally recommends LPL Financial to act as custodian of our client investment accounts. Factors we consider when recommending a custodian include their ability to hold the investments we use to implement our investment strategies and each custodian's financial strength, reputation, execution, pricing and service among other relevant factors. The client has the ability to select which custodian they will use.

The custodian generally is compensated by clients through commissions, trails, or other transaction based fees for trades that are executed through LPL Financial or that settle into the clients' accounts at the broker.. Trading client accounts through other brokers may result in fees (including mark-ups and mark-downs) being charged by the custodial broker and an additional broker.

While LPL Financial does not participate in, or influence the formulation of, the investment advice Harborfront provides, certain supervised persons of Harborfront are Dually Registered Persons. Dually Registered Persons are restricted by certain FINRA rules and policies from maintaining client accounts at another custodian or executing client transactions in such client accounts through any broker-dealer or custodian that is not approved by LPL Financial. As a result, the use of other trading platforms must be approved not only by Harborfront, but also by LPL Financial.

Clients should also be aware that for accounts where LPL Financial serves as the custodian, Harborfront is limited to offering services and investment vehicles that are approved by LPL Financial and may be prohibited from offering services and investment vehicles that may be available through other broker-dealers and custodians, some of which may be more suitable for a client's portfolio than the services and investment vehicles offered through LPL Financial.

Clients should understand that not all investment advisers require that clients custody their accounts and trade through specific broker-dealers.

Clients should also understand that LPL Financial is responsible under FINRA rules for supervising certain business activities of Harborfront and its Dually Registered Persons that are conducted through broker-dealers and custodians other than LPL Financial. LPL Financial charges a fee for its oversight of activities conducted through these other broker-dealers and custodians. This arrangement presents a conflict of interest because Harborfront has a financial incentive to recommend that you maintain your account with LPL Financial rather than with another broker-dealer or custodian to avoid incurring the oversight fee.

***Benefits of Using LPL as Custodian***

Harborfront receives support services and/or products from LPL Financial, many of which assist the Harborfront to better monitor and service program accounts maintained at LPL Financial; however, some of the services and products benefit Harborfront and not client accounts. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate, and may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provide access to client account data
- compliance and/or practice management-related publications
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products and services used by Harborfront in furtherance of its investment advisory business operations

LPL Financial may provide these services and products directly, or may arrange for third party vendors to provide the services or products to Advisor. In the case of third party vendors, LPL Financial may pay for some or all of the third party's fees.

These support services are provided to Harborfront based on the overall relationship between Harborfront and LPL Financial. It is not the result of soft dollar arrangements or any other express arrangements with LPL Financial that involves the execution of client transactions as a condition to the receipt of services. Harborfront will continue to receive the services regardless of the volume of client transactions executed with LPL Financial. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Harborfront to LPL or

any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement. However, because Advisor receives these benefits from LPL Financial, there is a potential conflict of interest. The receipt of these products and services presents a financial incentive for Advisor to recommend that its clients use LPL Financial's custodial platform rather than another custodian's platform.

***Brokerage for Client Referrals***

Harborfront does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

***Directed Brokerage***

Securities transactions are executed by brokers selected by Harborfront in its discretion and without the consent of clients. Harborfront may allow clients to direct the Firm to execute transactions through a specified broker-dealer. However, clients that do direct brokerage may cause the client to pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

***Order Aggregation***

Harborfront does not aggregate orders.

***Trade Error Policy***

Harborfront maintains a record of any trading errors that occur in connection with investment activities of its clients. Both gains and losses that result from a trading error made by Harborfront will be borne or realized by Harborfront.

***Oversight Fee for Assets Held Away***

As stated previously, individuals associated with Harborfront are licensed as registered representatives of LPL Financial. As a result of this licensing relationship, LPL Financial is responsible for supervising certain activities of Harborfront to the extent Harborfront manages assets at a broker/dealer and custodian other than LPL Financial. LPL Financial charges a fee for this oversight. This presents a conflict of interest in that Harborfront has a financial incentive to recommend that you maintain your account with LPL Financial rather than another custodian in order to avoid the oversight fee. However, to the extent Harborfront recommends you use LPL Financial for such services, it is because Harborfront believes that it is in your best interest to do so based on the quality and pricing of the execution, benefits of an integrated platform for brokerage and advisory accounts, and other services provided by LPL Financial.



## ITEM 13: REVIEW OF ACCOUNTS

### *Periodic Reviews*

Harborfront regularly reviews and evaluates client accounts for compliance with each client's investment objectives, policies, and restrictions. Harborfront analyzes rates of return and allocation of assets to determine model strategy effectiveness. Such reviews are conducted by the Chief Compliance Officer of Harborfront and shall occur at least once per calendar year.

### *Intermittent Review Factors*

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the Client's financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify Harborfront promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

### *Reports*

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the custodian.

## ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

### *Client Referrals*

Harborfront will not receive any economic benefit from another person or entity for soliciting or referring clients.

### *Other Compensation*

Harborfront does not pay another person or entity for referring or soliciting clients for Harborfront.

## ITEM 15: CUSTODY

### *Custodian of Assets*

Custody means holding, directly or indirectly, client funds or securities or having any authority to obtain possession of them.

Harborfront does not have direct custody of any client funds and/or securities. Harborfront will not maintain physical possession of client funds and securities. Instead, clients' funds and securities are held by a qualified custodian.

While Harborfront does not have physical custody of client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds client funds pursuant to the client's account application.

In certain jurisdictions, the ability of Harborfront to withdraw its management fees from the client's account may be deemed custody. Prior to permitting direct debit of fees, each client provides written authorization permitting fees to be paid directly from the custodian.

As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. The custodian does not calculate the amount of the fee to be deducted and does not verify the accuracy of Harborfront's advisory calculation. Therefore, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation. Clients should contact Harborfront directly if they believe that there may be an error in their statement.

The custodian utilized will be outlined in the client agreement.

## **ITEM 16: INVESTMENT DISCRETION**

Harborfront may exercise full discretionary authority to supervise and direct the investments of a client's account. This authority will be granted by clients upon completion of Harborfront's FSA. This authority allows Harborfront and its affiliates to implement investment decisions without prior consultation with the client, including the decision to allocate among models and/or TPAMs. Such investment decisions are made in the client's best interest and in accordance with the client's investment objectives. Other than agreed upon management fees due to Harborfront, this discretionary authority does not grant the Firm the authority to have custody of any assets in the client's account or to direct the delivery of any securities or the payment of any funds held in the account to Harborfront. The discretionary authority granted by the client to the Firm does not allow Harborfront to direct the disposition of such securities or funds to anyone except the account holder.

## **ITEM 17: VOTING CLIENT SECURITIES**

Harborfront does not perform proxy voting services on the client's behalf. Clients are encouraged to read through the information provided with the proxy voting documents and to make a determination based on the information provided. Upon the client's request, Harborfront representatives may provide limited clarifications of the issues presented in the proxy voting

materials based on his or her understanding of issues presented in the proxy voting materials. However, clients have the ultimate responsibility for making all proxy voting decisions.

## **ITEM 18: FINANCIAL INFORMATION**

### ***Balance Sheet Requirement***

Harborfront is not the qualified custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, six (6) months or more in advance.

### ***Financial Condition***

Harborfront does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients.

### ***Bankruptcy Petition***

Harborfront has not been the subject of a bankruptcy petition at any time during the last 10 years.