



MY PERSONAL CFO, LLC

a Registered Investment Adviser

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This brochure provides information about the qualifications and business practices of My Personal CFO, LLC (CRD #299424) (hereinafter “My Personal CFO” or the “Firm”). If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about the Firm is available on the SEC’s website at www.adviserinfo.sec.gov. The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

Item 2. Material Changes

This filing is My Personal CFO's annual updating amendment last filed on March 3, 2023. The Form ADV Part 2A (the "Firm Brochure") provides you with a summary of the My Personal CFO's advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interests. As a registered investment adviser, we are required to amend the Firm Brochure at least annually, within 90 days of our firm's fiscal year end of December 31. If there are any material changes to an adviser's Firm Brochure, the adviser is required to notify you and provide you with a description of the material changes. The following are material changes since our last annual filing is:

- The firm has updated its Brokerage Practices (Item 12).

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Item 4. Advisory Business

My Personal CFO offers a variety of advisory services, which include financial planning and consulting services, wealth management services, and retirement plan services. Prior to My Personal CFO rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with My Personal CFO setting forth the relevant terms and conditions of the advisory relationship (the "Advisory Agreement").

My Personal CFO was formed in 2018 and is principally owned by Mark Bernazzani. As of December 31, 2023, My Personal CFO had \$277, 000,000.00 in assets under management, of which all was managed on discretionary basis.

While this brochure generally describes the business of My Personal CFO, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm's officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or other persons who provide investment advice on My Personal CFO's behalf and are subject to the Firm's supervision or control.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title 1 of the Employee Retirement Income Act (ERISA) and the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than a level fee that is reasonable for our services; and
- Give you basic information about conflicts of interest.

Financial Planning and Consulting Services

My Personal CFO offers clients a broad range of financial planning and consulting services, which include any or all of the below-mentioned areas. Examples of the type of advice included for each area are included for reference.

- *Education Planning* - advising clients on the appropriate amount of capital required to pay for college costs, including a review of factors such as the age of potential students, the cost of potential anticipated higher education institution(s), inflation factors, and appropriate college savings programs;
- *Insurance Planning* - reviewing clients' existing life, health, and property insurance contracts and making recommendations based on clients' particular needs, such as retirement assets, college funding assets, and general liability coverage;
- *Tax Planning and Compliance* - reviewing clients' federal and state personal tax returns and providing planning strategies designed to reduce clients' overall effective income tax rates based on their current taxable and qualified investments and income sources, as appropriate;
- *Retirement Planning* - counseling clients on appropriate accumulation and distribution techniques concerning their taxable and qualified investments;
- *Trust and Estate Planning* – reviewing clients existing estate planning documents consisting of wills, trusts, and power of attorney forms and providing guidance on minimizing estate taxes and risks and/or opportunities related to the implementation and execution of their estate plan;
- *Cash Flow Forecasting and Budgeting* – reviewing clients income and regular expenses and offering analysis and recommendations related to maintaining sufficient assets to address planned and unforeseen expenses;
- *Philanthropic Advisory* – consulting with clients on creative ways to maximize their charitable goals while leveraging income tax rules to also meet their other objectives, including helping clients understand the various tax advantages to different giving strategies;
- *Executive Benefits Planning* – advising clients on various aspects of their company benefit plans, including how to leverage those plans for tax planning purposes and risk management;
- *Equity Compensation* – providing counsel to clients who are recipients of equity from their employers, including the tax advantages or consequences and the impact of the equity to clients' overall wealth and investments; and
- *Business Succession Advice* – providing recommendations to entrepreneurial clients who need to explore the business and tax implications of succession planning.

While each of these services is available on a stand-alone basis, certain of them can also be rendered in conjunction with investment portfolio management as part of a comprehensive wealth management engagement (described in more detail below).

In performing these services, My Personal CFO is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information. My Personal CFO recommends certain clients engage the Firm for additional related services and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists for the Firm to recommend that clients engage My Personal CFO or its affiliates to provide additional services for compensation, including the Firm's wealth management services discussed in this Item 4 and the accounting services discussed in Item 10, below. Clients retain absolute discretion over all

decisions regarding implementation and are under no obligation to act upon any of the recommendations made by My Personal CFO under a financial planning or consulting engagement. Further, clients have the option to purchase investment products that the Firm recommends through other professionals (e.g., brokers or investment advisers) are not affiliated with the Firm. Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising My Personal CFO's recommendations and/or services.

Wealth Management Services

My Personal CFO manages client investment portfolios through a wealth management relationship, whereby My Personal CFO provides a broad range of financial planning and consulting services and discretionary investment management services.

In managing client investment portfolios, My Personal CFO primarily allocates client assets among various mutual funds and exchange-traded funds ("ETFs"). Where appropriate, the Firm uses standard exchange-traded option contracts (i.e. put or call option contracts) as a risk management tool. Where appropriate, the Firm also provides advice about any type of legacy position or other investment held in client portfolios, however, clients should not assume that these assets are being continuously monitored or otherwise advised on by the Firm unless specifically agreed upon. Clients can also engage My Personal CFO to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, My Personal CFO directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company, or the custodian designated by the product's provider.

My Personal CFO tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. My Personal CFO consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify My Personal CFO if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients can impose reasonable restrictions or mandates on the management of their accounts if My Personal CFO determines, in its sole discretion, the conditions will not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

Retirement Plan Services

My Personal CFO provides advisory services to defined benefit plans subject to the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). Each defined benefit plan client is required to enter into an investment advisory or investment management agreement with My Personal CFO describing the services that My Personal CFO will perform for the retirement plan client and/or its

participants. For defined benefit plans, My Personal CFO's advisory services typically consist of investing and reinvesting the defined benefit plan's assets on a discretionary basis. In this capacity, My Personal CFO provides ERISA fiduciary services to defined benefit plans and is deemed to be acting as an investment manager under Section 3(38) of ERISA. In managing defined benefit plans' investment portfolios, My Personal CFO primarily allocates assets among various mutual funds and exchange-traded funds ("ETFs"). Where appropriate, the Firm uses standard exchange-traded option contracts (i.e. put or call option contracts) as a risk management tool.

Sub-Advisors

My Personal CFO retains sub-advisors or third-party managers to assist with managing portfolios if you need or are seeking a specific type of investment management or strategy. Sub-advisors provide investment allocations and securities selection and may execute securities transactions in your accounts pursuant to the agreement between Tactive and the subadvisor. This relationship will be fully disclosed with those sub-advisors in your Advisory Agreement. Certain sub-advisors use ETFs and or mutual funds in Client portfolios to which they are manager or sub-advisor. In these cases, the selection of these investments creates conflicts of interest for the sub-advisor. The sub-advisors disclose conflicts of interests including their selection of such investments, in their Form ADV 2. We advise you in establishing investment objectives, and work with the sub-advisors to ensure an appropriate investment strategy for you. You are provided the sub-advisor's Form ADV Part 2, and may be asked to enter into a separate Advisory Agreement.

Alternative Investments

Our Firm allows the use of Alternative Investments, if deemed suitable for the client portfolio. All client portfolios that are invested in Alternative Investments will be periodically reviewed by the CCO. Proper due diligence will be completed for all investments offered to clients which may include documentation of the firm's analysis of such alternative investments, and a description of how the firm will monitor these types of investments. Alternative Investments represent an asset class outside of the realm of traditional stocks, bonds and cash equivalents and may include; Opportunity zones, etc. . Most alternative investments have a high risk associated with including in a client's portfolio. (See Item 8: Risks)

Item 5. Fees and Compensation

My Personal CFO offers services on a fee basis, which includes hourly fees and fees based upon assets under management.

Financial Planning and Consulting Fees

My Personal CFO charges an hourly fee for providing financial planning and consulting services under a stand-alone engagement. Hourly fees are \$350 per hour. If the client engages the Firm for additional investment advisory services, My Personal CFO may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

The terms and conditions of the financial planning and/or consulting engagement are set forth in the

Advisory Agreement and My Personal CFO requires one-half of the estimated hourly fee payable upon execution of the Advisory Agreement. The outstanding balance is due upon delivery of the financial plan or completion of the agreed upon services. The Firm does not, however, take receipt of \$500 or more in prepaid fees in excess of six months in advance of services rendered.

In the event a stand-alone financial planning and consulting engagement is terminated prior to completion of the services, the Firm will provide a prorated refund of the fee. The Firm will calculate the amount of the prorated refund based upon its approximation of the percentage of the services completed as of the date of termination. In the event of such a termination, the Firm will provide work product completed as of the date of termination, to the extent it deems such work product usable by the client.

The Firm accepts personal checks and cash payment for its financial planning and consulting services. Where required, My Personal CFO sends to clients a written invoice itemizing the fee, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based. Clients who do receive this brochure (including all accompanying appendices, as applicable) and our brochure supplement(s) as set forth on Part 2B of Form ADV (as applicable) at least 48 hours prior to entering into the Advisory Agreement, may terminate the Agreement without penalty within 5 business days. My Personal CFO's hourly fee may be higher than the average fee charged by Washington state-registered investment advisers. Similar services may be offered by another investment adviser at a lower fee.

Wealth Management and Retirement Plan Fees

My Personal CFO offers wealth management and retirement plan services for an annual fee based on the amount of assets under the Firm's management. This annual fee varies and is negotiable but does not exceed 0.85% of Assets Under Management within your Account.

The annual fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by My Personal CFO on the last day of the previous billing period. If assets are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is not adjusted to reflect the interim change in portfolio value.

Additionally, for asset management services the Firm provides with respect to certain client holdings (e.g., held-away assets, accommodation accounts, alternative investments, etc.), My Personal CFO may negotiate a fee rate that differs from the range set forth above.

For the initial period of an engagement, the fee is calculated on a *pro rata* basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

Clients are advised that a conflict of interest exists for the Firm to recommend that clients engage My Personal CFO for additional services for compensation, including rolling over retirement accounts or moving other assets to the Firm's management. Clients retain absolute discretion over all decisions

regarding engaging the Firm and are under no obligation to act upon any of the recommendations.

Clients who do not receive this brochure at least 48 hours prior to entering into the Advisory Agreement may terminate the Advisory Agreement without penalty within 5 business days after entering into the contract.

Fee Discretion

My Personal CFO may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and pro bono activities.

Additional Fees and Expenses

In addition to the advisory fees paid to My Personal CFO, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include securities brokerage commissions, transaction fees, custodial fees, margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (*e.g.*, fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm receives no portion of securities brokerage commissions. The Firm's brokerage practices are described at length in Item 12, below.

Direct Fee Debit

Clients provide My Personal CFO with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to My Personal CFO. Where required, including (but not limited to) for residents of the State of Washington, My Personal CFO also sends to clients a written invoice itemizing the fee, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based. Alternatively, clients may elect to have My Personal CFO send a separate invoice for direct payment by personal check or cash.

Use of Margin

My Personal CFO may recommend that certain clients utilize margin in the client's investment portfolio or other borrowing. My Personal CFO only recommends such borrowing for non-investment needs, such as bridge loans and other financing needs. The Firm's fees are determined based upon the value of the assets being managed gross of any margin or borrowing.

Account Additions and Withdrawals

Clients can make additions to and withdrawals from their account at any time, subject to My Personal CFO's right to terminate an account. Additions can be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients can withdraw account assets on notice to My Personal CFO, subject to the usual and customary securities settlement procedures. However, the Firm designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a client's investment objectives. My Personal CFO may consult with its clients about the options and implications of transferring securities.

Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

Item 6. Performance-Based Fees and Side-by-Side Management

My Personal CFO does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

Item 7. Types of Clients

My Personal CFO offers services to individuals, trusts, estates, charitable organizations, corporations and business entities, and pension and profit-sharing plans (such as defined benefit plans).

Minimum Account Fee

As a condition for starting and maintaining an investment management relationship, My Personal CFO imposes a minimum annual fee of \$4,000. This minimum fee will cause clients with smaller portfolios to incur an effective fee rate that is higher than the Firm's stated fee. My Personal CFO may, in its sole discretion, elect to charge a lesser minimum fee based upon certain criteria, including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and pro bono activities.

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

Methods of Analysis

My Personal CFO utilizes a combination of fundamental and behavioral finance methods of analysis while employing an asset allocation strategy based on a derivative of Modern Portfolio Theory ("MPT").

Fundamental analysis involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer. For My Personal CFO, this process typically involves an analysis of an issuer's management team, investment strategies, style drift, past performance, reputation and financial strength in relation to the asset class concentrations and risk exposures of the Firm's model asset

allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security.

Behavioral finance analysis involves an examination of conventional economics as well as behavioral and cognitive psychological factors. Behavioral finance methodology seeks to combine a qualitative and quantitative approach to provide explanations for why individuals may, at times, make irrational financial decisions. Where conventional financial theories have failed to explain certain patterns, the behavioral finance methodology investigates the underlying reasons and biases that cause some people to behave against their best interests. The risks relating to behavior finance analysis are that it relies on spotting trends in human behavior that may not predict future trends.

Modern Portfolio Theory ("MPT") is a mathematical based investment discipline that seeks to quantify expected portfolio returns in relation to corresponding portfolio risk. The basic premise of MPT is that the risk of a particular holding is to be assessed by comparing its price variations against those of the market portfolio. However, MPT disregards certain investment considerations and is based on a series of assumptions that may not necessarily reflect actual market conditions. As such, the factors for which MPT does not account (*e.g.*, tax implications, regulatory constraints and brokerage costs) may negate the upside or add to the actual risk of a particular allocation. Nevertheless, My Personal CFO's investment process is structured in such a way to integrate those assumptions and real-life considerations for which MPT analytics do not account.

Investment Strategies

My Personal CFO's investment strategies include both long and short-term investment analysis, incorporating both macro and micro considerations to screen for appropriate risk adjusted investments. The Firm develops portfolio asset allocations based upon an appropriate balance of equities, fixed income, cash, and, in limited instances, margin and option tools, in order to achieve a client's specific portfolio objectives. The Firm bases its recommendations on client's growth, income and capital preservation needs and objectives. Each client's portfolio design is individualized to their unique requirements based on their cash flow needs, investment time horizon, prior investment experience as well as other specific factors. The Firm seeks to go beyond a simple questionnaire to help clients understand their risk tolerance and/or capacity. Where requested, the Firm will consider a client's preference for socially responsible investing.

The Firm believes in a long-term investment approach utilizing low cost, diversified and transparent investments for broad asset allocation. The Firm's investment strategy includes both passive and active management styles. Portfolios are broadly diversified across various asset categories which can include large, mid and small capitalization equities, international and emerging market equities, short and intermediate term investment grade bonds and less correlated asset classes, such as real estate, high-yield bonds and other potential alternatives. Portfolios are primarily be invested in institutional share class, no-load mutual funds and ETFs, however, in certain circumstances, the Firm may recommend maintaining positions in individual equities or bonds in conjunction with a more diversified portfolio.

Risk of Loss

The following list of risk factors does not purport to be a complete enumeration or explanation of the risks involved with respect to the Firm's investment management activities. Clients should consult with their legal, tax, and other advisors before engaging the Firm to provide investment management services on their behalf.

Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. Investing in securities involves risk of loss that clients should be prepared to bear. The profitability of a significant portion of My Personal CFO's recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. In addition, investments may be adversely affected by financial markets and economic conditions throughout the world. There can be no assurance that My Personal CFO will be able to predict these price movements accurately or capitalize on any such assumptions.

Volatility Risks

The prices and values of investments can be highly volatile, and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV. Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as

creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Cash Management Risks

The Firm may invest some of a client's assets temporarily in money market funds or other similar types of investments, during which time an advisory account may be prevented from achieving its investment objective.

Currency Risks

An advisory account that holds investments denominated in currencies other than the currency in which the advisory account is denominated may be adversely affected by the volatility of currency exchange rates.

Interest Rate Risks

Interest rates may fluctuate significantly, causing price volatility with respect to securities or instruments held by clients.

Options

Options allow investors to buy or sell a security at a contracted "strike" price at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (i.e., limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

Alternative Investments

These types of investments are associated with higher risks when purchased, sold and included within a client portfolio. Although these investments can offer potential diversification benefits because they do not typically correlate with the stock market, they also come with their own unique risks. These risks may include increased volatility, less regulation, lower transparency compared to traditional investments, higher fees, lack of liquidity, underlying issuer failure and difficult valuations.

Item 9. Disciplinary Information

My Personal CFO has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.

Item 10. Other Financial Industry Activities and Affiliations

This item requires investment advisers to disclose certain financial industry activities and affiliations.

Related Certified Public Accountant

Mark Bernazzani, My Personal CFO's principal, is a Certified Public Accountant and may provide accounting services to the Firm's advisory clients in his capacity as a Supervised Person of the Firm.

Outside of tax planning services, which may be provided as part of the financial planning and wealth management services described in Item 4, above, these accounting services are rendered pursuant to a separate agreement between the client and the Firm. There exists a conflict of interest to the extent that the Firm recommends advisory clients engage the Firm for accounting services where the Firm and its Supervised Persons receive additional compensation as a result.

Item 11. Code of Ethics

My Personal CFO has adopted a code of ethics in compliance with applicable securities laws (“Code of Ethics”) that sets forth the standards of conduct expected of its Supervised Persons. My Personal CFO’s Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of My Personal CFO’s personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (*e.g.*, initial public offerings, limited offerings). However, the Firm’s Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm’s policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person with access to this information may knowingly effect for themselves or for their immediate family (*i.e.*, spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by money market funds; and (iv) shares issued by other unaffiliated open-end mutual funds.

Clients and prospective clients may contact My Personal CFO to request a copy of its Code of Ethics.

The Firm notes that neither the Firm nor a related person of the Firm has a material financial interest in securities in which the Firm or a related person of the Firm recommends to clients or buys or sells for client accounts.

Item 12. Brokerage Practices

Recommendation of Broker-Dealers for Client Transactions

My Personal CFO typically recommends that clients utilize the custody, brokerage and clearing services of Schwab Advisor Services division of Charles Schwab & Co. ("Schwab"), a FINRA registered broker-dealer, member SIPC, for investment management accounts. Although My Personal CFO may recommend that clients establish accounts with the Custodians, it is ultimately the client's decision where to custody assets.

My Personal CFO is independently owned and operated and is not affiliated with Schwab.

Consistent with obtaining best execution, brokerage transactions are directed to certain broker-dealers in return for investment research products and/or services which assist My Personal CFO in its investment decision-making process. Such research will be used to service all of the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because My Personal CFO does not have to produce or pay for the products or services.

My Personal CFO periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

Software and Support Provided by Financial Institutions

My Personal CFO participates in the Schwab service program, which provides access to institutional trading and custody services. While there is no direct link between the investment advice we provide and participation in these programs, My Personal CFO receives certain economic benefits from this program. These benefits may include software and other technology that provides access to client account data (such as trade confirmations and account statements), facilitates trade execution (and allocation of aggregated orders for multiple client accounts), provides research, pricing information and other market data, facilitates the payment of our fees from its clients' accounts, and assists with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of My Personal CFO's ~~accounts~~ including accounts not held at Schwab. Schwab may also make available to us other services intended to help our firm manage and further develop its business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services to be rendered to My Personal CFO by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services, pay all or a part of the fees of a third-party providing these services to us, and/or Schwab may pay for travel expenses relating to participation in such training. Finally, participation in the Schwab program provides our firm with access to mutual funds which normally require significantly higher minimum initial investments or are normally available only to institutional investors.

The benefits received through participation in the Schwab program do not necessarily depend upon the proportion of transactions directed to Schwab. The benefits are received by our firm, in part because of commission revenue generated for Schwab by My Personal CFO's clients. This means that the investment activity in client accounts is beneficial to us, because Schwab does not assess a fee to My Personal CFO for these services. This creates an incentive for us to continue to recommend Schwab to its clients. While it may be possible to obtain similar custodial, execution and other services elsewhere at a lower cost, we believe that Schwab provides an excellent combination of these services. These services are not soft dollar arrangements but are part of the institutional platforms offered by Schwab.

Brokerage for Client Referrals

My Personal CFO does not consider, in selecting or recommending broker-dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

Directed Brokerage

The client may direct My Personal CFO in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by My Personal CFO (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, My Personal CFO may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Trade Aggregation

Transactions for each client will be effected independently, unless My Personal CFO decides to purchase or sell the same securities for several clients at approximately the same time. My Personal CFO may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's client differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and allocated among My Personal CFO's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which My Personal CFO's Supervised Persons may invest, the Firm does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. My Personal CFO does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a *de minimis* allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Item 13. Review of Accounts

Account Reviews

My Personal CFO monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least a quarterly basis. Such reviews are conducted by the Firm's principal, Mark Bernazzani. All investment advisory clients are encouraged to discuss their needs, goals and objectives with My Personal CFO and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and quarterly to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from My Personal CFO and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. In accordance with several states' securities laws, the Firm also sends certain clients duplicate fee statements, as discussed in Item 5. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from My Personal CFO or an outside service provider.

Item 14. Client Referrals and Other Compensation

My Personal CFO does not directly or indirectly compensate any persons for client referrals.

Item 15. Custody

My Personal CFO is deemed to have custody of client funds and securities because the Firm is given the ability to debit client accounts for payment of the Firm's fees. As such, client funds and securities are maintained at one or more Financial Institutions that serve as the qualified custodian with respect to such assets. Such qualified custodians will send account statements to clients at least once per calendar quarter that typically detail any transactions in such account for the relevant period. Where required, My PersonalCFO also sends to clients a written invoice itemizing the fee, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

In addition, as discussed in Item 13, My Personal CFO will also send, or otherwise make available, periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to invoices, statements, and/or reports received from My Personal CFO.

Item 16. Investment Discretion

My Personal CFO is given the authority to exercise discretion on behalf of clients. My Personal CFO is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. My Personal CFO is given this authority through a power-of-attorney included in the agreement between My Personal CFO and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). My Personal CFO takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold; and
- When transactions are made.

Item 17. Voting Client Securities

My Personal CFO does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations.

Item 18. Financial Information

My Personal CFO is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;

- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.