

Harris myCFO



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This brochure provides information about the qualifications and business practices of Harris myCFO, LLC. If you have any questions about the contents of this brochure, please contact Romey Del Fiugo at (650) 210-5418. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Harris myCFO, LLC is also available on the SEC's website at www.advisorinfo.sec.gov. Clients can search this site by a unique identifying number, known as a CRD number. Harris my CFO, LLC's CRD number is 110264. Registration with the SEC does not imply a certain level of skill or training.

ITEM 2. MATERIAL CHANGES

In this “Summary of Material Changes” section, we discuss only the material changes made to Part 2A Form ADV – Firm Brochure from March 30, 2012 forward.

- On December 10, 2012 RIA Holdings, Inc. was dissolved by its parent organization, BMO Financial Corp. As a result, BMO Financial Corp. is the direct owner of Harris myCFO LLC.
- On October 1, 2012 Harris myCFO, LLC commenced operations of the Real Assets Access Fund, LLC.
- On June 1 2012, Harris RIA Holdings, Inc. acquired CTC Consulting, LLC, an investment advisor registered with the Securities and Exchange Commission.
- RIA Holdings, Inc. merged two of its subsidiaries, Harris myCFO, LLC (“Harris myCFO”) and CTC Consulting, LLC on June 1, 2012. As a result, Harris myCFO, LLC now offers additional services (as described herein) under the CTC Consulting brand name.
- On May 1, 2012, Harris myCFO, LLC merged with Harris myCFO, Inc.

All sections amended to reflect material changes.

This brochure is available by contacting Romey DelFiugo at (650) 210-5418. Harris myCFO will provide you with a new brochure when changes or new information warrant or when you request, without charge.

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ITEM 4: ADVISORY BUSINESS

Harris myCFO, LLC ("Harris myCFO" or "the Firm") was organized on April 20, 2005, as a Delaware Limited Liability Company. Harris myCFO is a wholly-owned subsidiary of BMO Financial Corp.

Harris myCFO is marketed under Harris myCFO, LLC, its legal name, as well as the following brand names:

- Harris myCFO® - a brand name delivering services through Harris myCFO LLC, and certain divisions of BMO Harris Bank N.A., a national bank with trust powers and BMO Delaware Trust Company, a Delaware limited purpose trust company.
- CTC Consulting – a brand name and part of Harris myCFO, LLC, delivering consulting and investment advisory services.

As of November 30, 2012, Harris myCFO provided clients with discretionary management services on assets totaling \$6.5 billion, as well as nondiscretionary consulting services on assets totaling over \$17.5 billion.

Harris myCFO provides three primary service offerings:

1. Investment Advisory Services
2. Investment Consulting Services
3. Family Office Services

1. INVESTMENT ADVISORY SERVICES

Harris myCFO provides discretionary investment management to ultra high-net worth individuals and their families, personal trusts, family offices, and family businesses. As part of its investment advisory services, Harris myCFO writes investment policy statements; develops asset allocation strategies; selects both sub-advisers and investment funds of various types (mutual, private equity, hedge, venture capital, etc.); and monitors and reports on portfolio performance. Harris myCFO also offers investment implementation and administrative services to its clients.

Depending on clients' needs and objectives, Harris myCFO may recommend and utilize affiliated or unaffiliated investment managers to manage a portion of a client's portfolio. Such investment managers will have discretion to determine the type and amount of securities to be purchased or sold for the client for that portion of the client's assets managed by the investment manager. A due diligence and evaluation process is used to evaluate investment managers and funds, employing both quantitative and qualitative techniques to identify the managers we feel are best qualified to meet our clients' objectives.

Client portfolios are managed in accordance with each client's investment objectives and tailored to their individual needs, taking into consideration risk tolerance, time horizon, tax issues, liquidity and cash flow needs, restrictions/constraints, and other relevant guidelines. Harris myCFO's wealth management services involve the allocation of client assets among different asset classes with varying levels of risk and return. To this end, Harris myCFO's client portfolios are diversified across a variety of asset classes, including cash, defensive, growth, and private investments. Accounts may include, without limitation, equity securities, fixed income securities, limited partnerships, managed accounts, mutual funds, exchange-traded funds, hedge funds, commodity futures, options, private equity, venture capital investments and other alternative investments consistent with a client's suitability, overall investment strategy, and risk tolerance. Clients may impose restrictions on investing in certain securities or types of securities.

A. TYPES OF INVESTMENTS

The Firm provides investment advice to clients with respect to long-only investment managers, hedge funds, private markets funds and other investment vehicles. These third party managers invest in virtually all of the types of securities listed below. Investment recommendations are not limited to any specific product or service.

By virtue of its investment manager recommendations the Firm advises clients on the following types of investments:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Municipal securities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities
- Options contracts on commodities
- Futures contracts on tangibles
- Futures contracts on intangibles
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Interests in partnerships investing in other asset classes

Although recommended managers will typically utilize the types of investments listed above, the list is not exclusive. Recommended managers may ultimately use other types of investments in a client's portfolio.

B. INVESTMENT REPORTING SERVICES FOR NON-MANAGED CLIENT ASSETS

Harris myCFO provides investment reporting services to clients who request the Firm to report on the performance of client investments which are not managed by Harris myCFO. For accounts that receive reporting-only services, Harris myCFO does not participate in the selection of sub-advisers or in decisions regarding the selection, purchase, or sale of specific securities in these accounts. Consequently, Harris myCFO assumes no liability for the appropriateness for the client of any securities so reported or any diminution of value of assets for which the reporting services only are provided. Harris myCFO's reporting services include regular reports on asset performance, if applicable, comparison to established benchmarks, and analysis of sub-adviser and/or manager fees.

C. DISCRETIONARY SERVICES AND NONDISCRETIONARY SUB-ADVISORY SERVICES

Occasionally, Harris myCFO provides clients with the consulting services described later, but also has discretion, on behalf of some clients, to retain and terminate investment managers and to invest account assets in, and withdraw assets from, registered and unregistered funds (e.g., mutual funds, hedge funds and private markets funds).

One private fund to which Harris myCFO advises is the CTC Insurance Fund: a Series of the SALI Multi-Series Fund, LP (a private placement life insurance offering). Another private fund to which Harris myCFO advises is the CTC Madison Fund Series Interests: a Series of the SALI Multi-Series Fund, LP. SALI Fund Partners, LLC is the General Partner of these funds. The Firm is the non-discretionary sub-advisor to both the CTC Insurance Fund and the CTC Madison Fund.

The Firm serves as discretionary sub-adviser for the BA HF Solutions Funds and as discretionary investment adviser for Porthos Fund and the Real Assets Access Fund as described below.

◆ The CTC Insurance Fund: A Series within the SALI Multi-Series Fund, L.P.

The CTC Insurance Fund ("the Fund"), a series of the Separate Account Life Insurance (SALI) Multi-Series Fund, L.P., is a private insurance dedicated fund sub-advised by Harris myCFO.

SALI Multi-Series Fund, L.P. is a Delaware limited partnership (the "Partnership"). The Partnership's general partner, SALI Fund Partners, LLC (the "General Partner"), exercises ultimate authority over the Partnership and is responsible for its day-to-day operations. SALI Fund Management, LLC (the "SALI Investment Manager") is responsible for investing the partnership's assets.

The Firm has been retained by the Investment Manager to manage the Fund in a sub-advisory capacity and has been granted decision-making authority regarding the asset allocation and investments held by the Fund. Although the General Partner has final discretion, it has historically implemented all of the Firm's recommendations.

◆ The CTC Madison Fund: A Series within the SALI Multi-Series Fund, L.P.

The CTC Madison Fund ("the Madison Fund"), a series of the SALI Multi-Series Fund, L.P., is a private fund sub-advised by Harris myCFO.

The Partnership's General Partner exercises ultimate authority over the Partnership and is responsible for its day-to-day operations. The SALI Investment Manager is responsible for investing the partnership's assets.

The Firm has been retained by the SALI Investment Manager to manage the Madison Fund in a sub-advisory capacity and has been granted decision-making authority regarding the asset allocation and investments held by the Fund. Although the General Partner has final discretion, it has historically implemented all of Harris myCFO's recommendations.

◆ **Porthos Hedged Fund of Funds**

Harris myCFO serves as investment adviser to a proprietary hedge fund of funds, Porthos Hedged Fund of Funds, LLC ("Porthos"). Porthos is exempt from registration under the Investment Company Act of 1940, as amended (the "1940 Act").

Porthos Partners, LLC ("Porthos Partners"), an affiliate of Harris myCFO, serves as the manager of the Porthos Fund. The Firm receives an advisory fee, as described under Item 5 below, for serving as investment adviser to Porthos. Porthos Partners receives no compensation for its services as manager of the Porthos Fund.

In its role as investment adviser, the Firm has discretion to make investments on behalf of Porthos. Porthos invests in a portfolio of third party, unaffiliated, actively managed hedge funds. Detailed information about Porthos is included in the private offering memorandum for Porthos.

◆ **BA Hedge Fund Solutions**

BA Hedge Fund Solutions, LLC ("Hedge Fund Solutions") is a series of separate funds of hedge funds (each, a "BA HF Solutions Fund"). Bank of America Capital Advisors, LLC ("BACA"), a Bank of America Corporation ("BAC") company, is the Managing Member of Hedge Fund Solutions and the investment adviser of each BA HF Solutions Fund. The Firm serves as a discretionary sub-adviser for the BA HF Solutions Funds and is compensated by BACA as set forth below. Hedge Fund Solutions is exempt from registration under the Investment Company Act of 1940, as amended (the "1940 Act").

Each BA HF Solutions Fund invests substantially all of its assets in hedge funds managed by experienced investment managers who are not affiliated with Harris myCFO or any BAC company. Detailed information about each of the BA HF Solutions Funds, which include the BA Hedged Equity Fund, BA International Hedged Equity Fund, BA Global Opportunities Hedge Fund, BA Credit Opportunities Hedge Fund and BA Low Volatility Hedge Fund, is included in the private offering memorandum for the BA HF Solutions Funds.

Three of the BA HF Solutions Funds (BA Global Opportunities Hedge Fund, BA Credit Opportunities Hedge Fund and BA Low Volatility Hedge Fund) are in the process of liquidating.

◆ **Real Assets Access Fund ("RAAF")**

RAAF invests in real asset strategies by allocating assets to various Portfolio Funds and Portfolio Managers (each as defined below) on behalf of U.S. taxable investors. The LLC commenced operations on October 1, 2012. Harris myCFO, LLC, serves as the investment manager of the

RAAF and is primarily responsible for the RAAF's operational, administrative, investor relations, legal and compliance matters.

The fund's general investment objective is to generate attractive, risk-adjusted returns through a market cycle with a focus on preservation and enhancement of an investment portfolio's long-term purchasing power. The fund primarily invests in real asset strategies by purchasing interests of actively and passively managed long-only portfolios, separately managed accounts, exchange traded funds ("ETFs") and structured products, as well as limited and general partnerships, unit trusts, other investment entities commonly referred to as "hedge funds" and public investment funds (i.e. mutual funds). The Investment Manager of the fund intends principally to allocate Company assets to Portfolio Funds managed by unaffiliated investment advisers.

2. INVESTMENT CONSULTING SERVICES

As a result of the merger of Harris myCFO, LLC and CTC Consulting, LLC on June 1, 2012, Harris myCFO now engages in providing investment consulting services to wealthy family groups, trusts, endowments, foundations, retirement plans and financial institutions under the CTC Consulting brand name.

A. NONDISCRETIONARY CONSULTING SERVICES

In the role of delivering services under the CTC Consulting brand name, Harris myCFO provides analysis and makes recommendations to its clients; it does not have investment discretion over these client assets. As a consultant, Harris myCFO assists its clients in:

- Developing and reviewing investment policies
- Determining appropriate asset allocations (both strategic and tactical)
- Evaluating and making investment manager recommendations
- Monitoring the performance of the client's investments

Most of the investment recommendations relate to the retention and termination of investment managers and investments in "traditional" investments (long-only mutual funds and separately managed accounts) and "alternative" investments (limited partnership and limited liability company investment funds (hedge funds and private markets funds)).

B. LIMITED MANDATE CONSULTING SERVICES

For some of its consulting clients, Harris myCFO provides only a portion of the consulting services described above (e.g., providing clients solely with research or solely with performance reporting). Harris myCFO also provides some clients with due diligence reports on non-recommended investment managers.

For certain consulting clients Harris myCFO only constructs customized alternative investment portfolios (hedge funds and private markets funds) and advises clients on investing a portion of their assets in such funds. The customized portfolios are constructed in accordance with the parameters established in the client's investment policy statement. The minimum asset size for a customized portfolio generally is \$25 million.

Most clients receiving consulting services receive quarterly performance reports and monthly "flash" reports. From time to time, clients receive research and white papers.

C. OTHER CONSULTING SERVICES

The Firm has developed asset allocation software for its own use. In certain circumstances the Firm may license this software to interested parties, including advisory clients under the CTC Consulting brand name.

3. FAMILY OFFICE SERVICES

Harris myCFO assists clients in formulating an overall investment strategy and financial plan. This may include an analysis of a client's financial goals and possibly advice regarding estate planning, retirement planning, education funding, insurance planning and benefits planning, preparation of financial analyses, and personal financial statements reflecting net worth, capital sufficiency, cash flow, and income tax projections. Harris myCFO assists clients in opening brokerage accounts, in planning regarding to concentrated stock positions, in managing life events with financial implications such as divorce or education, and in placing insurance coverage. Harris myCFO works with clients to manage gift giving, such as by facilitating and implementing loans and gifts to family, by consulting regarding selecting assets for family and charitable giving, and by negotiating and monitoring gift or grant agreements.

Harris myCFO engages in providing additional comprehensive wealth management services to ultra high-net worth individuals. Such services include, in addition to those discussed above, financial planning, estate planning and administration, succession planning, tax compliance and consulting, personal chief financial officer ("CFO") and bookkeeping, expense management, lifestyle needs, and family office services.

Harris myCFO's family office services may or may not involve investment advisory services. In addition, they may also include to varying degrees administrative accounting, bookkeeping, operating business consulting services, and personal services for ultra high net worth individuals and families. When clients engage the services of a third party law firm, Harris myCFO performs certain administrative functions for clients such as structuring, reviewing and implementing trusts, and reviewing drafts of legal documents. Harris myCFO additionally assists clients with managing real estate deals and improvements and engages in various property management activities. Harris myCFO acts as a family office for clients who do not desire to operate and staff their own family office.

A. TAX ADVISORY AND COMPLIANCE

Harris myCFO will assist clients with their tax needs through tax advising and compliance services. These services include research and consulting on various tax matters, representing clients with examinations

and notices from the Internal Revenue Service and various state taxing authorities, and preparing exemption applications for client foundations and non-profit organizations, as well as individual and entity tax returns.

Harris myCFO's family office services may or may not involve investment advisory services. In addition, they may also include to varying degrees administrative accounting, bookkeeping, operating business consulting services, and personal services for ultra high net worth individuals and families. Harris myCFO will work with third party law firms engaged by clients to perform functions such as structuring, reviewing and implementing trusts, and reviewing drafts of legal documents. Harris myCFO also assists clients with asset purchases, management of real estate and other transactions including various ongoing property management activities, as well as oversight and execution of other projects.

B. FINANCIAL MANAGEMENT SERVICES

Harris myCFO assists client families with their integrated financial management. This includes expense management and bill pay services to ensure timely payment of invoices, transfer of funds, wire management, oversight of expenditures and cash flow, financial forecasting, and budgeting in order to enhance family decision-making around finances. Fees may vary based on scope of services to be provided as well as the complexity of the family structure. Fees may be invoiced based on hourly rates, fixed fee arrangements, or may be calculated according to the value of assets under advisement.

Item 5: Fees and Compensation

Harris myCFO's fees and compensation schedules are dictated by the type and level of the services for which it is engaged to provide to its clients.

1. INVESTMENT ADVISORY SERVICES FEE SCHEDULE

The investment advisory fee schedule is based on the market value of client assets under management. Assets under management include: (1) traditional and alternative assets and (2) concentrated equity positions. Alternative assets include, but are not limited to, venture capital investments, private investment pools, hedge funds, crossover funds and similar investments.

The Firm invoices fees quarterly in arrears, with the initial quarter's estimated fee due and payable in advance. For all fee schedules, a client's fee for the initial calendar quarter is based on the value of the client's assets under management as specified by the client. Future invoices will continue to be based on such values until Harris myCFO has received reports from the respective custodians to determine such assets' market values or until Harris myCFO otherwise determines the market values of such assets.

In subsequent quarters, Harris myCFO assesses fees at one-quarter (1/4) of the annual applicable percentage rate set forth in the client's fee schedule. The applicable annual percentage rate shall be determined quarterly based on the average of the market values in the client's account on the last calendar day of each calendar month during such calendar quarter. The quarterly fee is determined by applying one-quarter (1/4) of the applicable annual percentage rate to the average of the market values in the account on the last calendar day of each calendar month during the calendar quarter.

- INVESTMENT ADVISORY FEE SCHEDULE

Annual Percent (%)		Incremental Assets	Total AUM	Total Fee	Effective BPS
0.60%	for first	25,000,000	25,000,000	150,000	0.60%
0.40%	for next	25,000,000	50,000,000	250,000	0.50%
0.30%	for next	50,000,000	100,000,000	400,000	0.40%
0.25%	for next	100,000,000	200,000,000	650,000	0.33%
0.20%	for next	100,000,000	300,000,000	850,000	0.28%
0.15%	for next	100,000,000	400,000,000	1,000,000	0.25%
0.10%	for next	100,000,000	500,000,000	1,100,000	0.22%
0.05%	for next	250,000,000	750,000,000	1,225,000	0.16%
0.03%	for next	250,000,000	1,000,000,000	1,300,000	0.13%

- INVESTMENT ADVISORY FEE SCHEDULE FOR POOLED FUNDS

◆ FEES FOR CTC INSURANCE FUND

As investment sub-advisor to SALI Fund Management, LLC, the Firm receives from SALI a management fee of 0.25% per annum on the CTC Insurance Fund's Class A shares and 0.75% on the CTC Insurance Fund's Class B shares.

The Firm does not typically recommend insurance as part of our advisory services. It is possible, however, that an insurance carrier could present the CTC Insurance Fund as an option to a CTC client. A client who invested in the CTC Insurance Fund through its insurance carrier could pay a fee to Harris myCFO for advisory services as well as a management fee through SALI Fund Management, LLC for the CTC Insurance Fund.

◆ FEES FOR CTC MADISON FUND

As investment sub-advisor to SALI Fund Management, LLC, the Firm receives from SALI a management fee on the CTC Madison Fund's assets, as follows:

Assets	Fee
\$0 - \$37,500,000	0.450% per annum plus
\$37,500,001 - \$49,999,999	0.420% per annum plus
\$50,000,000 - \$100,000,000	0.390% per annum plus
More than \$100,000,000	0.370% per annum

◆ Fees for BA HF Solutions Funds

The BA HF Solutions Funds offer a multi-class investment structure currently comprised of several classes of equity interests. Only Class C interests are available to qualified clients of the Firm.

Class C holders (i.e., qualified clients) pay BACA the following annual investment management fees with respect to BA HF Solutions Hedged Equity Fund and BA HF Solutions International Hedged Equity Fund (payable quarterly in arrears):

Capital Account	Annual Fee
On the first \$2 million	0.625%
On the next \$3 million	0.575%
On the next \$5 million	0.525%
On the next \$15 million	0.450%
On Assets \$25 million and above	0.375%

Effective January 1, 2012, BACA has waived its annual investment management fee for all interest holders with respect to the liquidating BA HF Solutions Funds: BA Global Opportunities Hedge Fund, BA Low Volatility Hedge Fund and BA Credit Opportunities Hedge Fund.

BACA pays the Firm no portion of BACA's investment management fees for Class C interests. However, because Class C holders are Harris myCFO clients, they pay consulting or investment advisory fees to the Firm in accordance with their separate client agreements.

BACA pays the Firm a sub-advisory fee of 0.30% on all assets in two of the BA HF Solutions Funds (excluding assets applicable to Class C interests) and 0.20% on all assets in the three liquidating BA HF Solutions Funds (excluding assets applicable to Class C interests).

◆ FEES FOR PORTHOS FUND

The Porthos Fund offers a multi-series investment structure comprised of Series A Interests, Series B Interests and Series C Interests. Series A Interests are offered solely to the clients of particular financial advisers designated by Porthos Partners. Series C Interests are offered only to investors who are fee paying direct clients of the Firm, as well as members, partners, affiliates and employees of the Firm and Porthos Partners. Series B Interests are offered to any investor who is not eligible to purchase Series A Interests or Series C Interests.

Investors in the Porthos Fund pay the Firm the following advisory fee (payable quarterly in arrears):

Porthos Fund	Advisory Fee
Series A	0.75%
Series B	1.25%
Series C	None

Porthos Partners, in its sole discretion, may waive or modify the advisory fees set forth in the table above for certain large or strategic investors and trusts or other entities for their benefit, without entitling such investor or any other investor to any, or any further, waiver or reduction.

◆ FEES FOR RAAF

The RAAF offers a multi-series investment structure comprised of Series A Interests and Series B Interests. Series A Interests are offered solely to the clients of Harris myCFO, LLC. Series B Interests are offered only to investors who are clients of BMO Harris Bank N.A.

Investors in the RAAF pay the Firm the following advisory fee (payable quarterly in arrears):

RAAF Fund	Advisory Fee
Series A	0.00%
Series B	0.75%

The RAAF, in its sole discretion, may waive or modify the advisory fees set forth in the table above for certain large or strategic investors and trusts or other entities for their benefit, without entitling such investor or any other investor to any, or any further, waiver or reduction.

2. INVESTMENT CONSULTING SERVICES FEE SCHEDULE

Harris myCFO charges a fixed fee or a percentage-of-assets fee for consulting services provided under the CTC Consulting brand. Fees are negotiated, based on factors such as:

- The range of services to be provided
- The degree of customization requested by the client
- The complexity of the client relationship
- The number, nature and size of accounts
- The number of client meetings Harris myCFO is expected to attend annually

When a fixed fee applies, Harris myCFO and the client determine the total fees for the project or retainer. When a percentage-of-assets fee applies, Harris myCFO and the client determine the applicable percentage, which will not exceed 1.5% of the assets in the account.

Fixed fees are paid monthly or quarterly in arrears or in advance on a quarterly basis, as negotiated and approved by the client.

Percentage-of-assets fees are paid quarterly in arrears or in advance on a quarterly basis, as negotiated and approved by the client.

When Harris myCFO constructs and monitors a stand-alone customized alternative investment portfolio for a client (i.e., when Harris myCFO is providing no other services to the client), the fee schedule for these services is based primarily on the size of the customized portfolio to be developed. The annual fee may be structured as either a percentage-of-assets fee or a fixed fee, with such fee ranging up to 1.5% of the assets in the customized portfolio or a comparable fixed fee. Such fees are negotiable.

If a client terminates its contract with Harris myCFO during a month or quarter in which the client has paid fees in advance, the client will receive a pro rata refund of the fees paid for that period.

Harris myCFO sends invoices directly to its clients. In the event that a client requests that Harris myCFO send its invoices to the client's custodian for payment, Harris myCFO will send the original invoice to the custodian while also providing a copy to the client for reference.

Harris myCFO, under the CTC brand, generally bills clients separately for its travel and other out-of-pocket expenses, as negotiated and approved by the client.

3. FAMILY OFFICE SERVICES FEE SCHEDULE

Harris myCFO may also serve clients according to a fixed-fee arrangement or on an hourly or per diem basis depending upon the scope, frequency and complexity of the service being performed. For services where Harris myCFO serves as an independent, full service family office—providing tax advisory and compliance, bill payment, cash flow management, consolidated reporting, estate advisory, risk and insurance management, as well as philanthropy and family meetings, governance and/or education—a fixed-fee arrangement is most common. Depending on complexity, the number of client entities and the number of individuals and households served this fee will vary and are considered on a case-by-case basis; however, a minimum fee of \$150,000 may be applicable.

For hourly and other project related activities that are outside of the scope of fixed-fee arrangements or are otherwise non-recurring in nature, Harris myCFO may also charge hourly or per diem fees. Such fees will vary based on the scope and duration of the service, required staffing levels to support the service and other considerations as appropriate. All fees will be agreed upon in advance with the client.

4. ADDITIONAL FEES

REPORTING-ONLY SERVICE FEES

Fees for reporting services, exclusive of any advisory services, vary based on the number of reporting accounts and the number, types, and complexity of the requested reports.

OTHER FEES

The Firm has developed asset allocation software for its own use. In certain circumstances the Firm may license this software to interested parties, including advisory clients. No client is obligated to license any software from the Firm.

The Firm receives no fees or compensation from a non-client when the Firm recommends to its clients that they invest assets with a particular investment manager or in a particular fund. The Firm is never compensated by the investment manager or fund manager for such recommendations.

NEGOTIATED FEES AND MINIMUMS

Clients may negotiate fees and in some cases may agree to a flat fee. In general, Harris myCFO's minimum account size is \$25 million and the corresponding annual fee is \$150,000. Harris myCFO reserves the right to waive our minimum account size and fee at our discretion. Some current clients are on fee schedules no longer offered.

REFERRAL FEES

Harris myCFO currently has no referral fee arrangements.

ADDITIONAL FEE DISCLOSURES

Harris myCFO's fees do not include fees a client may be charged by sub-advisers, private funds, mutual funds, brokers, custodians, or other third parties. Clients may elect to have their portfolios debited directly for the fees incurred or have an invoice mailed directly to them.

Harris myCFO rebates unearned advisory fees upon termination of the investment advisory contract.

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

GENERAL FEE INFORMATION

Investment Manager Fees: All fees paid for discretionary investment advisory services and nondiscretionary consulting services are separate and distinct from the fees and expenses charged by the investment funds the Firm recommends. The investment funds' fees and expenses are described in each fund's offering documents. Each fund's fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A qualified client could typically invest in a fund directly, without the Firm's services. In that case, the client would not receive the services provided by the Firm which are designed, among other things, to assist the client in determining which funds are most appropriate to each client's financial condition and objectives. In addition to the fees described above, alternative investment managers typically charge incentive and/or performance-based fees. In all cases, the client should review both the fees charged by the funds and Harris myCFO fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. Any fee discounts that are negotiated with Harris myCFO's recommended fund managers are negotiated on behalf of its clients and benefit the clients investing in those funds.

Additional Fees and Expenses: In addition to advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager affects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Firm Brochure for additional information.

Grandfathering of Minimum Account Requirements: Pre-existing advisory clients are subject to the minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, minimum account requirements will differ among clients.

ERISA Accounts: Harris myCFO is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts ("IRAs") subject to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, Harris myCFO is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Harris myCFO may only charge fees for investment advice about products for which it and/or its related persons do not receive any commissions or 12b-1 fees. The Firm receives no commissions or 12b-1 fees from any of the funds the Firm recommends.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances does the Firm require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

Wrap Fees: Harris myCFO does not participate in or sponsor any wrap fee programs.

ITEM 6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Harris myCFO does not accept performance-based fees. However, Harris myCFO serves as general partner and discretionary investment adviser to certain private investment funds (the “myCFO Funds”). As advisor to the myCFO Funds, Harris myCFO receives an annual Management Fee equal to 0.75% of the aggregate Capital Commitments of each investor. In addition, each investment is subject to the management fee (generally 2%-2.5% of the capital commitment) and performance allocation (generally 20% of net profits) charged by the underlying funds in which the myCFO Funds invest.

Further, while the Harris myCFO does not accept performance-based fees, investment managers it recommends may charge performance-based fees.

ITEM 7. TYPES OF CLIENTS

Harris myCFO generally provides services to a select segment of ultra high net worth individuals. Harris myCFO defines the ultra high net worth market segment as individuals or families with more than \$100MM net worth or \$25MM of investment assets. Harris myCFO may waive these minimum requirements in the event that a client is able to make representations concerning their sophistication as an investor and their ability to bear the risk of loss of their entire investment under Harris myCFO's management.

In addition to ultra high net worth individuals, Harris myCFO may also provide services to:

- Pension and profit sharing plans
- Investment advisers
- Other pooled investment vehicles
- Charitable organizations
- Corporations
- State and municipal government entities
- Private and public foundations
- Multi-family offices
- Endowments

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

Methods of Analysis

Asset Allocation: A core focus of the Firm's advisory services is to recommend an asset allocation appropriate for the investment objectives and risk tolerance of each client. Harris myCFO's asset allocation recommendations are informed by its long-term expectations for each asset class, as well as Harris myCFO's near-term views, in order to provide tactical recommendations to take advantage of immediate investment opportunities. Harris myCFO's Investment Committee, comprised of Senior Consultants, Senior Investment Advisors, and Directors of Research, meets quarterly to determine its view of asset class valuations and monthly to determine tactical themes. Harris myCFO uses proprietary asset allocation software and subjective analysis to determine the optimal mix of assets for each client.

Harris myCFO implements the investment strategy by selecting investment managers, individual securities, private investment funds and/or mutual funds that it believes are compatible with the policy.

As a general matter, sub-advisers and private investment funds are identified and selected based on a variety of factors.

Investment Manager Selection: Once a client's asset allocation is determined, Harris myCFO works closely with that client to recommend investment managers to fill the allocations across asset classes. The process for selecting investment managers combines both in-depth qualitative and quantitative analysis by Harris myCFO's research analysts. Examples of the qualitative analysis include alignment of manager incentives to client goals, understanding the drivers of the strategy and implementation, risk controls and internal procedures, experience of the manager and overall quality of the management and the organization. Multiple interviews with various staff members, an onsite visit and reference checks are also part of Harris myCFO due diligence process. Examples of the quantitative analysis include performance history, regression analysis, financial statements, universe and benchmark comparison, and overall evaluation of risk and reward statistics as well as minimum dollar investment requirements and fees.

The process for completing due diligence on an investment manager generally takes between three and six months. The final step in the process is for the research department to present a detailed manager profile to Harris myCFO's Investment Committee for approval for investment in client portfolios.

Harris myCFO requires clients to make certain representations concerning their sophistication as investors and their awareness of the risk of loss of their entire investment under Harris myCFO's management. Due to the nature of the various investment styles and investment managers that Harris myCFO recommends to clients, they may be subject to numerous forms of risk.

Investment Strategies: Harris myCFO recommends investment managers and funds which may use one or more of the following strategies in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, time horizons, and liquidity requirements among other considerations:

Long-term purchases. The investment funds Harris myCFO recommends may purchase securities with the idea of holding them in the client's account for a year or longer. Typically Harris myCFO

recommends this strategy when:

- it believes the securities to be currently undervalued, and/or
- it wants exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, the client may not take advantage of short-term gains that could be profitable to the client. Moreover, if the fund manager's predictions are incorrect, a security may decline sharply in value before the fund manager makes the decision to sell.

Short-term purchases. When utilizing this strategy, investment funds purchase securities with the idea of selling them within a relatively short time (typically a year or less). The Firm, under the CTC brand, may recommend funds that use this strategy in an attempt to take advantage of conditions that the fund manager believes will soon result in a price swing in the securities the fund purchases.

A short-term purchase strategy poses risks should the anticipated price swing not materialize; the fund manager is then left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss.

In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Trading. Certain funds Harris myCFO recommends may purchase securities with the idea of selling them very quickly (typically within 30 days or less). They do this in an attempt to take advantage of predictions of brief price swings.

Utilizing a trading strategy creates the potential for sudden losses if the anticipated price swing does not materialize. Moreover, under those circumstances, the fund manager is left with few options:

- having a long-term investment in a security that was designed to be a short-term purchase, or
- the potential of having to taking a loss.

In addition, because this strategy involves more frequent trading than does a longer-term strategy, there will be a resultant increase in brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Short sales. Fund managers borrow shares of a stock from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed shares are then sold. On the agreed-upon future date, the fund manager buys the same stock and returns the shares to the original owner. Fund managers engage in short selling based on their determination that the stock will go down in price after they have borrowed the shares. If they are correct and the stock price has gone down since the shares were purchased from the original owner, the client account realizes the profit.

Short selling results in some unique risks:

- *Losses can be asymmetric.* A short sale loses when the stock price rises, and a stock is not limited (at least, theoretically) in how high it can go. For example, if a client shorts 100 shares at \$50 each, hoping to make a profit but the shares increase to \$75 per share, the client would lose \$2,500. On the other hand, the price of a stock cannot fall below \$0, which limits the client's potential upside.
- *Short squeezes can wring out profits.* As stock prices increase, short seller losses also increase as sellers rush to buy the stock to cover their positions. This increase in demand, in turn, further drives the prices up.

- *Timing.* Even if a fund manager is correct in determining that the price of a stock will decline, the manager runs the risk of incorrectly determining when the decline will take place, i.e., being right too soon. Although a company is overvalued, it could conceivably take some time for the price to come down; during which the client is vulnerable to interest, margin calls, etc.

Option writing. Harris myCFO may recommend options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives the client the right to buy an asset at a certain price within a specific period of time. The client would buy a call if it had determined that the stock would increase substantially before the option expired.
- A put gives the holder the right to sell an asset at a certain price within a specific period of time. A client would buy a put if it had determined that the price of the stock would fall before the option expired.

Harris myCFO may recommend options to speculate on the possibility of a sharp price swing. Harris myCFO may also recommend options to "hedge" a purchase of the underlying security; in other words, Harris myCFO may recommend an option purchase to limit the potential upside and downside of a security purchased for your portfolio.

Harris myCFO may recommend "covered calls", in which the client sells an option on a security it owns. In this strategy, the client receives a fee for making the option available, and the person purchasing the option has the right to buy the security from the client at an agreed-upon price.

Harris myCFO may recommend a "spreading strategy", in which the client purchases two or more option contracts (for example, a call option that the client buys and a call option that the client sells) for the same underlying security. This effectively puts the client on both sides of the market, but with the ability to vary price, time and other factors.

A risk of covered calls is that the option buyer does not have to exercise the option, so that if the client wants to sell the stock prior to the end of the option agreement, the client has to buy the option back from the option buyer, for a possible loss.

A risk of spreading strategies is that the ability to fully profit from a price swing is limited.

Other strategies. Harris myCFO recommends investment managers to its clients. The recommended investment managers typically have discretion over the assets in the client's account with the manager. The investment managers Harris myCFO recommends may employ additional strategies which have not been described above.

RISK OF LOSS: All investments face the risk of loss of capital. Harris myCFO makes no guarantee or representation of performance.

While Harris myCFO recommends that clients diversify across assets classes in order to achieve optimal returns, a risk of asset allocation is that the client might be "underweighted" to their strategic targets in a particular asset class and may not participate in sharp increases in a particular market sector. Another risk is that the ratio of asset classes will change over time due to market movements and, if not rebalanced, will no longer be appropriate for the client's goals. A comprehensive investment policy based on the integration of liquidity needs, risk tolerance, tax implications, wealth transfer and philanthropic goals helps mitigate some of these asset allocation risks.

The key risks of the manager selection process are that Harris myCFO has misjudged the merits of an investment manager and the manager's ability to repeat the successful execution of that strategy moving forward. Harris myCFO might have misunderstood the risks inherent in a certain strategy or incorrectly judged the strength of the recommended firm as a business. In addition, the investment manager recommended may not perform as well as Harris myCFO expected. Harris myCFO might also recommend a fund at a time when the investing environment is challenging for that particular strategy. For these reasons and others generally inherent with investing (see below), a client could lose money investing in the managers and funds Harris myCFO recommends.

- **Loss of Capital.** The possibility of partial or total loss of capital exists and clients should be prepared to bear the consequences of such loss.
- **Fraud.** Harris myCFO conducts due diligence reviews of its approved sub-advisers. However, due diligence is not a perfect process and may not uncover all problems.
- **Business and Financial Risk of Sub-advisers.** Individual investment managers may experience rapidly changing business conditions or unforeseen loss of capital causing the firm to have a weak financial condition.
- **Limited Liquidity.** In some circumstances, clients will experience limited liquidity, which may mean a limited ability to sell, transfer, exchange, assign, pledge, hypothecate or otherwise dispose of their investments.
- **Alternative Assets.** Alternative assets present several unique risks including liquidity risk and counterparty risk.
- **Taxation.** Timing of capital gains, purchases and sales, and changes or modification to existing tax laws may negatively affect the performance of a client's portfolio.
- **Valuation.** Certain securities or market conditions may make it difficult or impossible to efficiently price securities.
- **Institutional Risk.** Institutions such as brokerage firms, banks, or managed funds will have custody of the client's assets. Bankruptcy, fraud, or misrepresentation could impair a client's portfolio.
- **Counterparty Risk.** In certain circumstances a sub-adviser may enter into a transaction involving counterparty creditworthiness. These risks may differ materially from those entailed in exchange-traded transactions.
- **International Investments.** International investing presents unique risks including currency risk and exposure to foreign investment rules and regulations. Currency exchange rates are highly volatile and a profitable investment may lose its value because of currency fluctuations.

ITEM 9. DISCIPLINARY INFORMATION

Harris myCFO is required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of its advisory business or the integrity of its management.

Harris myCFO and its management personnel have no reportable disciplinary events to disclose.

Item 10. Other Financial Industry Activities and Affiliations

Harris myCFO has no officers, directors, or employees registered as or pending registration as a broker-dealer or registered representative of a broker-dealer.

Harris myCFO has no officers, directors, or employees registered as or pending registration as a futures commission merchant, commodity pool operator, commodity-trading advisor, or an associated person of the foregoing entities.

Harris myCFO provides specific services which include collecting receivables, preparing budgets, paying bills, monitoring bank accounts, assisting in identifying appropriate insurance coverage, implementing retirement, estate, and philanthropy planning, preparing income tax estimates and returns, and assisting in the purchase, sale, rental, financing, or refinancing of property. The client should consult the separate agreement for more details on these services.

As stated in Item 2 – “Material Changes” – Harris myCFO also operates under two brand names Harris myCFO® and CTC Consulting. Harris myCFO® includes certain divisions of BMO Harris Bank N.A., a national bank affiliate with trust powers. Pursuant to an agreement with BMO Harris Bank N.A., Harris myCFO receives research and other services essential to their investment advisory services offering.

As noted above, Harris myCFO serves as a discretionary sub-advisor to the BA Hedge Fund Solutions funds and is compensated by BACA as referenced. See Item 5 – “Fees and Compensation”.

Harris myCFO also serves as investment adviser to one proprietary fund of funds, the Porthos Fund. In its role as investment adviser, Harris myCFO has discretion to make investments on behalf of the Porthos Fund. The Porthos Fund invests in a portfolio of third party, unaffiliated, actively managed unregistered hedge funds. Detailed information about the Porthos Fund is included in the private offering memorandum for Porthos Fund. Porthos Fund may not be suitable for all qualified clients.

Harris myCFO, Porthos Partners and/or their principals may invest in Porthos Fund and, thus, will share in the profits and losses of Porthos Fund. Such investments may create a conflict of interest due to this economic interest and/or other factors.

The CTC Insurance Fund, a series of the SALI Multi-Series Fund, L.P., is a private insurance dedicated fund sub-advised by Harris myCFO. Harris myCFO serves as sub-advisor to SALI Fund Management, the investment manager of the CTC Insurance Fund. The interests in the CTC Insurance Fund are offered through a confidential private offering memorandum, which describes the limited partnerships interests of the fund.

ITEM 11. CODE OF ETHICS

Harris myCFO understands its role as a fiduciary and the importance of protecting the integrity of the clients' assets as well as the Firm. Therefore, in accordance with SEC rules and the Firm's principles, Harris myCFO has established a Code of Ethics, which governs the actions of the officers and employees of Harris myCFO. Among other items, the aforementioned Code of Ethics address potential conflicts of interest, a prohibition against making buy/sell decisions on non-public information, and disclosing individual portfolio holdings and transaction reports.

A copy of the Harris myCFO Code of Ethics is available to clients upon request.

ITEM 12. BROKERAGE PRACTICES

In recommending a broker for any transaction or series of transactions, Harris myCFO considers a number of factors including, without limitation, the broker's commission rate, convenience, execution quality, clearance and settlement capabilities, past experience with the broker (including prior performance in serving Harris myCFO's clients), reputation, error resolution, research services, block trading and block positioning capabilities, back office efficiency, financial stability, and the broker's willingness to execute difficult transactions in the future. In seeking best execution for client trades, the determining factor is not the lowest possible commission rate, but rather the broker/dealer's ability to provide qualitative executions, competitive commission rates, research, and other professional services.

If Harris myCFO believes that the purchase or sale of a security is in the best interest of more than one client, Harris myCFO may, aggregate the securities to be sold or purchased, to the extent permitted by applicable laws and regulations and consistent with Harris myCFO's duties to its clients. Pricing and timing of aggregated transactions may not be the same for all accounts. Harris myCFO will allocate the transactions, as well as the expenses incurred in the transactions in an equitable manner. Under these circumstances, a disparity in prices may exist between the prices paid by a client who directs Harris myCFO to use a particular broker or dealer and other clients who do not direct Harris myCFO to use a particular broker or dealer.

Harris myCFO's does not effect any principal transaction with, or agency cross securities transactions or cross trades between, client accounts.

Harris myCFO does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

Harris myCFO has adopted an allocation policy that applies to all investment opportunities offered to Harris myCFO clients. The allocation policy applies to discretionary and nondiscretionary clients, allocates investment opportunities fairly and equitably among clients, and provides consistent treatment of clients with similar investment objectives and guidelines to the extent practicable.

When demand for a particular investment opportunity exceeds the capacity available, eligible clients that are already invested in that fund or with that investment manager will have the first priority to invest in any new investment opportunity offered by the same fund or manager. This preference recognizes that managers generally prefer their current investors when making subsequent offerings. It also enables clients to more easily limit the number of investments in their portfolios, making their portfolios more manageable.

The allocation policy also gives preference to clients whose investment requests in a prior investment opportunity were cut-back under the allocation policy. These preferences make it more difficult for new clients and for those clients who previously did not request to participate in a particular investment opportunity to participate in the next investment opportunity offered by that particular fund or manager. Although Harris myCFO will attempt to leverage its relationship with the manager to obtain capacity for all clients, such additional capacity may not always be available.

ITEM 13. REVIEW OF ACCOUNTS

Senior investment professionals regularly review accounts. Harris myCFO provides clients with quarterly reports, which provide detailed information concerning the performance of the client's account and other matters. Information provided in the quarterly reports is based on information available as of the prior quarter's end, except insofar as valuations and transactions in certain investments are not provided to Harris myCFO by third parties on a timely basis.

Although official statements of account holdings are provided by the custodian(s) of client accounts, Harris myCFO may provide position reconciliation and aggregate account summary reporting for clients' convenience. Information on these summaries is based on electronic or hard copy statements provided by brokers, custodians or other third party providers. Although Harris myCFO makes reasonable efforts to highlight and correct missing or inaccurate information on custodians' statements, the summary statements prepared by Harris myCFO should be considered solely as informational rather than official records.

Harris myCFO has not established a maximum number of investment management accounts that can be reviewed by one person, but believes that a person generally will be responsible for no more than 20 accounts.

Clients with investment supervisory and investment management accounts receive quarterly performance reports. Clients invested in the BA HF Solutions Funds and Porthos Fund receive quarterly performance reports, year-end tax information and annual financial statements.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

It is generally Harris myCFO's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to Harris myCFO.

It is also Harris myCFO's policy not to accept or allow its related persons to accept compensation from any person or entity, including cash, sales awards or other than prizes, from a non-client as identified in conjunction with the investment management agreement. Harris myCFO does not compensate, directly or indirectly, any unsupervised person for client referrals.

Item 15. Custody

Due to the nature of its client relationships Harris myCFO is deemed to have custody of client assets. Harris myCFO has engaged KPMG LLP to conduct the annual surprise custody examination as required under the Investment Advisers Act of 1940.

As previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure, Harris myCFO may directly debit advisory fees from client accounts if requested to do so.

As part of this 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.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact Harris myCFO directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, Harris myCFO also sends performance reports, including account balances, directly to its clients on at least a quarterly basis. Harris myCFO urges its clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

ITEM 16. INVESTMENT DISCRETION

Clients may hire Harris myCFO to provide discretionary asset management services, in which case it may make fund purchases for a client's account without contacting the client prior to each purchase to obtain the client's permission.

Harris myCFO's discretionary investment authority includes the ability to do the following without contacting the client:

- Determine the fund to buy or sell; and/or
- Determine the amount of the fund to buy or sell; and/or
- Move cash and/or securities between a client's accounts

Clients give Harris myCFO discretionary authority when they sign a discretionary agreement with it and reserve the authority to place limitations on the discretionary authority of Harris myCFO. Such limitations are most often restrictions on the types or amounts of securities to be purchased and are either placed within the investment guidelines or provided to Harris myCFO via a separate written instruction from the client. Clients may also change or amend such limitations by once again providing Harris myCFO with written instructions.

Harris myCFO accepts discretionary authority to manage the client's investment assets. As part of the advisory agreement with the client, Harris myCFO obtains a limited power of attorney with authority to, among other things, invest assets in a wide variety of asset classes (suitable to client's investment objectives and appropriate strategies), retain certain service providers, including sub-advisers to manage the client's investment assets, and recommend private investment funds — private equity, venture capital, hedge, etc.

ITEM 17. VOTING CLIENT SECURITIES

As a matter of Firm policy and practice, Harris myCFO generally no longer accepts engagements requiring the voting on behalf of advisory clients. Typically, clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios or they delegate proxy voting to the underlying investment managers.

In the event that Harris myCFO is required to vote proxies for a client, it will do so in accordance with its proxy voting policy and procedures. Because of the CTC Consulting, LLC acquisition there is one legacy client where we have proxy voting authority. Under Harris myCFO's proxy voting policy, we have a fiduciary duty to act solely in the best interests of the applicable client when exercising proxy voting authority.

When Harris myCFO has voting authority, it must vote client securities in a timely manner and make voting decisions that are in the best long-term economic interests of clients. To fulfill its responsibility, Harris myCFO has adopted a proxy voting policy that establishes voting guidelines on most issues with respect to which Harris myCFO will vote proxies on behalf of its clients.

Material conflicts of interest are resolved in the best interest of clients. If Harris myCFO determines there is, or may be, a material conflict of interest in voting proxies between Harris myCFO's interests and those of the client, we may choose among the following options to address the conflict:

1. Vote in accordance with our pre-determined proxy voting guidelines, in the best interests of its clients, should, in most cases, adequately address any possible conflict of interest.
2. Resolve the conflict by obtaining the client's consent.

In cases where Harris myCFO has voting authority for securities held by its client in funds managed by Harris myCFO, we may have a conflict of interest in voting these securities on behalf of our clients, particularly in matters relating to approval of the investment management agreement, advisory or other fees, or mergers and acquisitions. In these circumstances, Harris myCFO will:

1. Resolve the conflict by obtaining the client's consent; or
2. Vote the securities in accordance with the recommendations of an independent third-party voting firm.

A client may obtain, without charge, a copy of Harris myCFO 's proxy voting policy or information on how Harris myCFO voted the securities held by the client by contacting Kathryn L. Kameron at (503) 228-4300.

ITEM 18. FINANCIAL INFORMATION

Under no circumstances does Harris myCFO require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, Harris myCFO is not required to include a balance sheet in this Firm Brochure.

As an advisory firm that maintains discretionary investment authority for certain client accounts, Harris myCFO is also required to disclose any financial condition that is reasonably likely to impair Harris myCFO's ability to meet its contractual obligations. Harris myCFO has no additional financial circumstances to report.

Harris myCFO has not been the subject of a bankruptcy petition at any time during the past ten years.

ITEM 19. REQUIREMENTS OF STATE REGISTERED ADVISORS

Not Applicable