

## Item 1 Cover Page



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January 24, 2014

(Last Annual Update: December 26, 2013)

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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](http://www.advisorinfo.sec.gov). Clients can search this site by a unique identifying number, known as a CRD number. Harris myCFO, 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 since April 1, 2013.

- Item 4 (Advisory Business) – The descriptions of non-advisory services provided by Harris myCFO, LLC (under “Investment Reporting Services for Non-managed Client Assets and Family Office Services”) were moved to Item 10 (Other Financial Industry Activities and Affiliations).

In addition, amendments were made regarding (i) the brand name utilized by Harris myCFO, LLC, (ii) the change of Harris my CFO’s role on January 1, 2014 from investment advisor to sub-advisor for Porthos Hedged Fund of Funds, LLC and Real Asset Access Fund, LLC (Item 4 and Item 10), (iii) the change of Manager for Porthos Hedged Fund of Funds, LLC and Real Assets Access Fund, LLC from Porthos Partners, LLC and Harris myCFO, LLC, respectively, to BMO Asset Management Corp., and (iv) additional instances where Harris myCFO, LLC may be deemed to have custody of client assets and clarification of the qualified custodian requirements for client funds and securities (Item 15).

Pursuant to SEC rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

Our brochure may be requested, at any time, without charge, by contacting Romey DelFiugo at (650) 210-5418.

Additional information about Harris myCFO, LLC is also available via the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s website also provides information about any persons affiliated with Harris myCFO, LLC who are registered, or are required to be registered, as investment adviser representatives of Harris myCFO, LLC.

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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. The Firm is a wholly-owned subsidiary of BMO Financial Corp., which is a wholly-owned subsidiary of Bank of Montreal (BMO).

The Firm markets itself under Harris myCFO, LLC, its legal name, as well as the brand name CTC Consulting | Harris myCFO. CTC Consulting | Harris myCFO is a brand name delivering services through various affiliates of BMO.

As of September 30, 2013, Harris myCFO provided clients with discretionary management services on assets of \$8.4753 billion, as well as nondiscretionary consulting services on assets of \$18.65 billion.

Harris myCFO provides two primary advisory service offerings:

1. Investment Advisory Services
2. Investment Consulting Services

Harris myCFO also provides certain clients with non-advisory services, such as family office services and investment-reporting services for assets under management with other investment managers, which are not subject to the Investment Advisers Act of 1940. These services are discussed in greater detail under Item 10 “Other Financial Industry Activities and Affiliations” of this brochure.

### 4.1 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 the client 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 have discretion to determine the type and amount of securities purchased or sold for the client for that portion of the client’s assets managed by the investment manager. The firm employs a due diligence and evaluation process to evaluate

investment managers and funds, employing both quantitative and qualitative techniques to identify the managers we feel are qualified to meet our clients' objectives.

Harris myCFO manages each client portfolio in accordance with the client's investment objectives taking into consideration each client's 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 diversifies client portfolios 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.

#### **4.1.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.

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.

#### **4.1.B. Discretionary Services and Nondiscretionary Sub-Advisory Services**

In some cases, clients engage Harris myCFO to provide investment consulting services with discretionary authority to retain and terminate investment managers, invest account assets in, and withdraw assets from, registered and unregistered funds (e.g., mutual funds, hedge funds and private markets funds).

Harris myCFO provides non-discretionary sub-advisory services for the:

- CTC Insurance Fund, a Series of the SALI Multi-Series Fund, LP (private placement life insurance offering);
- CTC Madison Fund Series Interests, a Series of the SALI Multi-Series Fund L.P.

In both of these circumstances SALI Fund Partners, LLC is the general partner of the fund. Separate Account Life Insurance (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. Although the General Partner has final discretion, Harris myCFO's primary responsibility is to determine and recommend asset allocation and investments held in the fund. Historically, the General Partner has implemented all of the Firm's recommendations.

Harris myCFO provides discretionary advisory or sub-advisory services for the:

- BA HF Solutions Funds, LLC
- Porthos Hedged Fund of Funds, LLC
- Real Assets Access Fund, LLC

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. BACA engages the firm as a discretionary sub-adviser for the BA HF Solutions Funds. 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 unaffiliated hedge funds managed by experienced investment managers. 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.

Harris myCFO serves as investment subadviser to a proprietary hedge fund of funds, Porthos Hedged Fund of Funds, LLC (“Porthos”). Porthos is exempt from registration under the 1940 Act. On January 1, 2014, the investment adviser for Porthos changed from Harris myCFO to BMO Asset Management Corp. (“BMO AM”), an affiliate. Harris myCFO will serve as the discretionary subadviser to Porthos. Prior to January 1, 2014, Harris myCFO, the successor to CTC Consulting, LLC, was the investment manager and Porthos Partners, LLC, an affiliate of Harris myCFO, was the manager.

In its role as investment subadviser to Porthos, Harris myCFO is responsible for the day-to-day and overall investment management operations. 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.

Harris myCFO also serves as the investment subadviser to Real Assets Access Fund, LLC (“RAAF”), a proprietary fund. RAAF is exempt from registration under the 1940 Act. RAAF invests in real asset strategies by allocating assets to various portfolio funds and

portfolio managers on behalf of U.S. taxable investors. RAAF commenced operations on October 1, 2012. In its role as investment subadviser to RAAF, Harris myCFO is responsible for the day-to-day investment management operations. On January 1, 2014, the investment manager and manager for RAAF changed from Harris myCFO to BMO AM. Prior to January 1, 2014, Harris myCFO was the investment manager and manager for RAAF.

The general investment objective of RAAF 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. RAAF 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). BMO AM and Harris myCFO, as investment adviser and investment subadviser, respectively, intend principally to allocate RAAF assets to portfolio funds managed by unaffiliated investment advisers.

## **4.2 Investment Consulting Services**

Harris myCFO also provides investment consulting services to wealthy family groups, trusts, endowments, foundations, retirement plans and financial institutions.

### **4.2.A. Nondiscretionary Consulting Services**

Harris myCFO provides investment analysis and makes investment recommendations to its clients in a non-discretionary capacity. Consulting services include:

- 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)).

#### **4.2.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 other 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 firm builds custom portfolios 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.

#### **4.2.C. Other Consulting Services**

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

## **Item 5 Fees and Compensation**

The type and level of service the Firm provides to a client dictates the Harris myCFO fee and compensation schedule.

### **5.1 Investment Advisory Services Fee Schedule**

Harris myCFO bases its investment advisory fee schedule 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. The firm estimates fees for the initial quarter based on the client's estimated market value of the assets under management. Harris myCFO invoices initial fees in advance. Future invoices will continue to be based on such values until Harris myCFO has received reports from the respective custodians to determine the actual market value or until Harris myCFO otherwise determines the market value of such assets.

In subsequent quarters, Harris myCFO assesses fees at one-quarter (1/4) of the annual 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.

Harris myCFO reserves the right to modify the fee schedule set forth below depending on the range of services provided, the complexity of the client relationship, the number, nature and size of accounts and/or other factors.

#### **Investment Advisory Fee Schedule**

| <b>Annual Percent (%)</b> |           | <b>Incremental Assets</b> | <b>Total AUM</b> | <b>Total Fee</b> | <b>Effective BPS</b> |
|---------------------------|-----------|---------------------------|------------------|------------------|----------------------|
| 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 intentionally recommend insurance to its advisory clients. 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 the sub-advisor to SALI Fund Management, LLC, and the Firm receives from SALI a management fee on the CTC Madison Fund's assets based on the following schedule.

| 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 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 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 Hedged Fund of Funds**

Porthos offers a multi-series investment structure comprised of Series A Interests, Series B Interests and Series C Interests. Porthos offers series A Interests solely to (1) advisory clients of BMO AM and affiliates of BMO AM, and (2) advisory clients of certain investment managers designated by BMO AM. Porthos offers Series C Interests only to investment advisory clients of Harris myCFO who are parties to an investment management agreement with Harris myCFO. Porthos offers Series B Interests to any investor who is not eligible to purchase Series A Interests or Series C Interests.

Investors in Porthos pay BMO AM the following advisory fee, assessed quarterly in arrears. Pursuant to the Firm's subadvisory agreement with BMO AM, Harris myCFO receives from BMO AM fifty percent (50%) of such advisory fees paid to BMO AM.

| Porthos Fund | Advisory Fee |
|--------------|--------------|
| Series A     | 1.00%        |
| Series B     | 1.25%        |
| Series C     | None         |

BMO AM, in its sole discretion, reserves the right to waive or negotiate 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 additional or further waiver or reduction.

### **Fees for RAAF**

RAAF offers a multi-series investment structure comprised of Series A Interests, Series B Interests, and Series C Interests. RAAF offers Series A interests solely to investment advisory clients of Harris myCFO who already have an investment management agreement with Harris myCFO. RAAF offers Series B Interests to investment advisory clients of BMO AM and certain clients of affiliates of BMO AM. RAAF offers Class C Interests to eligible external investors.

Investors in RAAF pay BMO AM the following advisory fee (payable quarterly in arrears). Pursuant to the Firm's subadvisory agreement with BMO AM, Harris myCFO receives from BMO AM fifty percent (50%) of such advisory fees paid to BMO AM.

| RAAF Fund | Advisory Fee |
|-----------|--------------|
| Series A  | 0.00%        |
| Series B  | 0.75%        |
| Series C  | 1.00%        |

BMO AM, 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.

## **5.2 Investment Consulting Services Fee Schedule**

Harris myCFO bases its investment consulting fees on a fixed fee or a percentage-of-assets fee for consulting services provided under the CTC Consulting brand. Factors considered when negotiating fees include:

- The range of services provided

- 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 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. The annual fee is 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 generally bills clients separately for its travel and other out-of-pocket expenses, as negotiated and approved by the client.

### **5.3 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**

Harris myCFO's fees do not include fees 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. 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 recommendations.

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.

#### **5.4 Other Fee Information**

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 with a corresponding annual fee of \$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.

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 fund the Firm recommends. Each fund's offering documents describe the applicable fund fees and expenses. Generally, each fund's fees 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, as a matter of due diligence, the client is urged to review both the fees charged by the funds and Harris myCFO fees. Harris myCFO negotiates fee discounts with some recommended fund managers on behalf of its clients. 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.

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.

Referral Fees: See Item 14 for additional information on client referrals and other compensation, including between Harris myCFO and its affiliates.

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



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

Harris myCFO does not engage clients with performance based fee schedules. 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 2.0%-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.

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

## Item 7 Types of Clients

Harris myCFO engages clients in the following market segments:

- Ultra high net worth individuals; defined as individuals with net worth in excess of \$100MM or investment assets of \$25MM
- 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

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.

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

*Investing in securities involves risk of loss that clients should be prepared to bear.* Investment products are not FDIC insured, have no bank guarantee and may lose value. Harris myCFO makes no guarantee or representation of performance.

### Asset Allocation

Recommending appropriate asset allocations to clients is a core focus of the Harris myCFO advisory services. Investment objectives and risk tolerance are the core components of an asset allocation strategy. Harris myCFO devises its asset allocation strategy based on 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.

Harris myCFO identifies and selects sub-advisers and private investment funds 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 within various 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. Harris myCFO's due diligence process includes interviews of various staff members, an onsite visit and reference checks. 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 the Harris myCFO Investment Committee for approval.

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 designed for 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.

While Harris myCFO recommends that clients diversify across asset 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.

## **Derivatives**

Certain funds managed by Harris myCFO, including Porthos and the RAAF, may hold swaps and other derivative instruments. In addition, Harris myCFO and/or other investment managers recommended by Harris myCFO may directly invest client assets in swaps and other derivative instruments. The pricing of derivatives is uncertain, variable and based on theoretical models, the outputs of which may vary substantially from the prices actually recognized in the market. The market for many types of derivative instruments is comparatively illiquid and inefficient, creating the potential for substantial mispricings, as well as sustained deviations between theoretical and market value. The primary risks associated with the use of derivatives are (i) model risk, (ii) market risk and (iii) counterparty risk. Counterparty risk includes not only the risk of default and failure to pay mark-to-market amounts and return risk premium, but also the risk that the market value of over-the-counter derivatives will fall if the creditworthiness of the counterparties to those derivatives weakens. The prices of derivative instruments also can be highly volatile. Price movements of derivative instruments are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments and national and international political and economic events and policies. In addition, governments from time to time intervene, directly and by regulation, in certain markets. Such intervention often is intended directly to influence prices and may, together with other factors, cause all of such markets to move rapidly in the same direction because of, among other things, interest rate fluctuations.

Uncertainties in the derivatives markets continue due to proposed regulatory initiatives, moves toward over-the-counter derivatives clearing, and allegations of inappropriate behavior by market participants to cause or avoid payments under credit default swaps.

## **Item 9 Disciplinary Information**

SEC regulations require Harris myCFO 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**

CTC Consulting | Harris myCFO is a brand name delivering family office services and investment advisory services through Harris myCFO, LLC, an investment adviser registered with the U.S. Securities and Exchange Commission and a Commodity Pool Operator registered with the National Futures Association; trust, deposit and loan products and services through BMO Harris Bank N.A., a national bank with trust powers; and trust services through BMO Delaware Trust Company, a Delaware limited purpose trust company. BMO Delaware Trust Company offers trust services only, does not offer depository, financing or other banking products, and is not FDIC insured. Not all products and services are available in every state and/or location.

Investment products are not FDIC insured, have no bank guarantee and may lose value.

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

The Firm is registered as a Commodity Pool Operator with the Commodity Futures Trading Commission ("CFTC"), and is a member of the National Futures Association ("NFA").

Pursuant to an agreement with BMO Harris Bank N.A., the Firm receives research and other services essential to their investment advisory services offering.

The Firm also provides certain clients with non-advisory services, such as family office services and investment-reporting services for assets under management with other investment managers, which are not subject to the Investment Advisers Act of 1940.

### **Investment Reporting Services for Non-Managed Client Assets**

In some cases, clients engage Harris myCFO to provide investment-reporting services for assets under management with other investment managers. 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 of these securities or any diminution of value of assets for which the client receives reporting only services. Harris myCFO's reporting services include regular reports on asset performance, if applicable, comparison to established benchmarks, and analysis of management fees.

## Family Office Services

Harris myCFO acts as a family office for clients who do not desire to operate and staff their own family office.

In this regard, Harris myCFO assists clients in formulating an overall financial plan. Family office services include analysis of a client's financial goals, estate and trust planning, retirement planning, education funding, insurance planning and benefits planning, preparation of financial analyses, production of personal financial statements reflecting net worth, capital sufficiency, cash flow, and income tax projections. Harris myCFO assists clients in opening brokerage accounts, analysis of concentrated stock positions, managing life events with financial implications such as divorce or education, and in placing insurance coverage. In addition to these services, Harris myCFO works with clients to manage gifting strategies such as facilitating and implementing loans and gifts to family, analysis of asset selection for family and charitable giving, and negotiating and monitoring gift or grant agreements.

Further, clients engage Harris myCFO to provide comprehensive wealth administration services to ultra high net worth individuals. Wealth administration services include, financial planning, estate planning and administration, succession planning, tax compliance and consulting, personal chief financial officer and bookkeeping, expense management, lifestyle needs, and miscellaneous family office services.

In some circumstances family office services include, administrative accounting, bookkeeping, operating business consulting services, and personal services for ultra high net worth individuals and families. Harris myCFO performs certain administrative functions for clients such as identifying beneficial trust structures, reviewing existing estate planning documents and coordinating with legal counsel to modify estate planning documents. Harris myCFO additionally assists clients with asset purchases, management of real estate deals and other transactions including various ongoing property management activities, as well as oversight and execution of other projects.

**Tax Advisory and Compliance.** Harris myCFO assists clients with tax needs through tax advising and compliance services. Tax advising and compliance 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. Additionally, the firm provides administrative

accounting, bookkeeping, operating business consulting services, and personal services for ultra high net worth individuals and families.

Administrative 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. Harris myCFO invoices financial management service fees based on hourly

The Firm provides tax preparation services through an agreement with BMO Asset Management Corp. for certain of its Cedar Street Advisors clients. Cedar Street Advisors is a brand name used by various financial providers of BMO Financial Corp, including BMO Harris Bank N.A. and BMO Asset Management Corp.

The Firm may have common management and officers with some of its affiliates. The Firm relies on Bank of Montreal and BMO Financial Corp. for various administrative support, including information technology, human resources, business continuity, legal, finance, enterprise risk management, and internal audit.

See Item 14 for additional information on client referrals and other compensation between the Firm and its affiliates.

Harris myCFO clients, regardless of their advisory relationship, are under no obligation to use BMO Harris Bank N.A., BMO Delaware Trust Company, or any other BMO Financial Group affiliate as custodian of their assets.

Certain employees of Harris myCFO currently participate in a Seattle-based advisory board. The advisory board is comprised of Harris myCFO representatives, Seattle based leaders of BMO Harris Bank N.A., and members of the Seattle business community. Advisory board members may receive compensation or reimbursement for their participation on the advisory board from BMO Harris Bank; however, members do not receive compensation for any referrals or retention of existing clients.

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 subadvisor to two proprietary funds, Porthos and RAAF. On January 1, 2014, the investment adviser for Porthos and RAAF changed from Harris myCFO to BMO AM. In its role as investment subadvisor, Harris myCFO has discretion to make

investments on behalf of these funds. These funds each invest in a portfolio of third party, unaffiliated, actively managed unregistered hedge funds. Detailed information about Porthos and RAAF is included in their respective private offering memorandums. Porthos and RAAF may not be suitable for all qualified clients. Harris myCFO is the registered commodity pool operator of RAAF, with many of its management persons serving as associated persons, and currently is benefiting from temporary relief from registration as the commodity pool operator of Porthos pursuant to CFTC No-Action Letter No. 12-38.

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

Harris myCFO serves as sub-advisor to SALI Fund Management, the investment manager of the CTC Insurance Fund and CTC Madison Fund Series Interests, each a Series of the SALI Multi-Series Fund, LP. The interests in these funds are offered through a confidential private offering memorandum, which describes the limited partnerships interests of each 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. Employees, subject to preclearance, may invest in private investment funds recommended to clients.

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 affect 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.

Official statements of account holdings are provided by the custodian(s) of client accounts. In most situations Harris myCFO provides position reconciliation and aggregate account summary reporting for clients' convenience. The firm bases this information on the 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 serve solely as informational rather than official records.

Harris myCFO has not established a maximum number of investment management accounts, but believes the capacity of one person is approximately 20 accounts.

Clients with investment supervisory and investment management accounts receive quarterly performance reports. Clients invested in the BA HF Solutions Funds, RAAF 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 unaffiliated third-party solicitors. Harris myCFO has entered into certain referral arrangements with respect to the SALI Multi-Series Fund, LP.

From time to time, Harris myCFO compensates certain of its employees for client referrals, which may include the introduction of new clients or the retention of existing clients. It also may enter into arrangements whereby payments are made to Bank of Montreal, BMO Harris Bank N.A., or other affiliates of Harris myCFO in the BMO group of companies (collectively referred to as "Harris myCFO Affiliates") and/or their respective employees and officers, for clients referred to Harris myCFO by Harris myCFO Affiliates. Harris myCFO Affiliates may include other investment advisers registered with the SEC or with securities regulators in foreign countries, U.S. or foreign banks, U.S. or foreign broker-dealers, or other regulated entities.

Referral payments are paid by Harris myCFO and do not result in any additional fee to any Harris myCFO advisory clients.

Alternatively, officers and employees of Harris myCFO may introduce new clients or otherwise market products and services of one or more of the Harris myCFO Affiliates under solicitation agreements with the applicable Harris myCFO Affiliates, and such persons may receive incentive compensation related to such activities.

## **Item 15 Custody**

Given the nature of its relationships with clients, Harris myCFO is deemed to have custody of client assets under Rule 206(4)-2 of the Investment Advisers Act of 1940 (the "Custody Rule").

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, Harris myCFO advises the client's custodian of the fee amount for deduction 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.

Harris myCFO may be deemed to have custody of client assets in instances where an affiliated qualified custodian, such as BMO Harris Bank N.A. or BMO Delaware Trust Company, maintains custody of client accounts. Harris myCFO clients, regardless of their advisory relationship, are under no obligation to use BMO Harris Bank N.A., BMO Delaware Trust Company, or any other BMO Financial Group affiliate as custodian of their assets.

Harris myCFO is also deemed to have custody of client assets in instances where it has been granted authority to (i) open accounts at qualified custodians on behalf of clients or (ii) send cash or securities to third parties.

Harris myCFO, except in the limited circumstances permitted by the Custody Rule, may not maintain securities on behalf clients. Such securities subject to the Firm's investment advisory services must be maintained at the client's qualified custodian. Harris myCFO will promptly return any securities received to the sender or, in certain circumstances, directly to the client's qualified custodian.

Harris myCFO has engaged KPMG LLP to conduct the annual surprise custody examination as required under the Custody Rule.

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 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.

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 Romey Del Fiugo at (650) 210-5418.

## **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.

## **Additional Information**

### **Privacy Notice**

Harris myCFO's Privacy Notice, which includes information on options about how a client's information may be shared within BMO and its affiliates and with others, is available by contacting Romey Del Fiugo at (650) 210 5418.

### **Anti- Money Laundering**

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement or a trust agreement. We may be required to disclose this information pursuant to applicable laws, rules or regulations, but it will otherwise be retained in confidence according to our privacy policy.