

**Item 1 Cover Page for Brochure Supplement**

Delbert J. Smith, CPA

HARBOR CAPITAL ADVISORY SERVICES, INC.

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Fairport, NY 14450

(585) 425-4090

December 31, 2016

**This brochure supplement provides information about Delbert J. Smith that supplements the Harbor Capital Advisory Services, Inc. brochure. You should have received a copy of that brochure. Please contact Frank Monte [fmonte@hcasmail.com](mailto:fmonte@hcasmail.com) at (585) 425-4090 Ext: 2 if you did not receive Harbor Capital Advisory Services, Inc.'s (HCAS) brochure or if you have any questions about the contents of this supplement.**

**Additional information about Delbert J. Smith is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 Educational Background and Business Experience

Disclose the *supervised person's* name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years. If the *supervised person* has no high school education, no formal education after high school, or no business background, disclose this fact. You may list any professional designations held by the *supervised person*, but if you do so, you must provide a sufficient explanation of the minimum qualifications required for each designation to allow *clients* to understand the value of the designation.

### Delbert J. Smith

*Year of Birth:* Born 1961

*Formal Education:*

- Bachelors in Business Administration, Rochester Institute of Technology, 08/2003
- CPA license date 05/1992.

Business Background for the Previous Five Years:

- Harbor Capital Advisory Services, Inc., Investment Advisory Representative, 1/2009 – Present
- Harbor Financial Group, Inc., Associate, 01/2006 - Present
- Delbert J. Smith, CPA, P.C. Certified Public Accountant, 11/2001 – Present
- American Portfolios Financial Services, Inc., Registered Representative, 8/2009 – 12/2015
- Mutual Service Corporation, Registered Representative, 01/2009 – 08/2009
- First Global, Registered Representative, 08/2007 – 12/2008

## Item 3 Disciplinary Information

If there are legal or disciplinary events material to a *client's* or prospective *client's* evaluation of the *supervised person*, disclose all material facts regarding those events.

A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the *supervised person*

1. was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any *felony*; (b) a *misdemeanor* that *involved* investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. is the named subject of a pending criminal *proceeding* that involves an *investment- related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;

**3. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or**

**4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the *supervised person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*.**

Mr. Smith has not been the subject of a criminal or civil action in a domestic, foreign or military court therefore this question is not applicable.

**B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which the *supervised person***

**1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or**

**2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority**

**(a) denying, suspending, or revoking the authorization of the *supervised person* to act in an *investment-related* business;**

**(b) barring or suspending the *supervised person's* association with an *investment-related* business;**

**(c) otherwise significantly limiting the *supervised person's investment-related* activities; or**

**(d) imposing a civil money penalty of more than \$2,500 on the *supervised person*.**

Mr. Smith has not been the subject of an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

**C. A *self-regulatory organization (SRO)* proceeding in which the *supervised person***

**1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or**

**2. was *found* to have been *involved* in a violation of the *SRO's* rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from *investment-***

***related activities; or (iii) fined more than \$2,500.***

Mr. Smith has not been the subject of a self-regulatory organization (SRO) proceeding.

**D. Any other *proceeding* in which a professional attainment, designation, or license of the *supervised person* was revoked or suspended because of a violation of rules relating to professional conduct. If the *supervised person* resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a *proceeding* (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.**

Mr. Smith has not been the subject of a proceeding in which a professional attainment, designation or license was revoked or suspended.

#### **Item 4 Other Business Activities**

**A. If the *supervised person* is actively engaged in any *investment-related* business or occupation, including if the *supervised person* is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated *person* of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.**

Harbor Financial Group (HFG) is a licensed insurance agency. Associated persons of HCAS may also be involved in the sale of insurance products. As such, associated persons can effect transactions in insurance products for Clients and earn commissions for these activities. Mr. Smith may also be involved in the sale of insurance products through other licensed insurance agency entities that are not related to HCAS or HFG.

**1. If a relationship between the advisory business and the *supervised person*’s other financial industry activities creates a material conflict of interest with *clients*, describe the nature of the conflict and generally how you address it.**

See the response to Item 4A above.

**2. If the *supervised person* receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the *supervised person* receives. Explain that this practice gives the *supervised person* an incentive to recommend investment products based on the compensation received, rather than on the *client*’s needs.**

See the response to Item 4A above.

**B. If the *supervised person* is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the *supervised person's* income or involve a substantial amount of the *supervised person's* time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the *supervised person's* time and income, you may presume that they are not substantial.**

Mr. Smith is a Certified Public Accountant with his own firm, Delbert J. Smith, CPA, P.C. and spends approximately 250 hours per month (150 hours during market hours) on this activity.

#### **Item 5 Additional Compensation**

**If someone who is not a *client* provides an economic benefit to the *supervised person* for providing advisory services, generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the *supervised person's* regular salary. Any bonus that is based, at least in part, on the number or amount of sales, *client* referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.**

Not applicable to Mr. Smith.

#### **Item 6 Supervision**

**Explain how you *supervise the supervised person*, including how you monitor the advice the *supervised person* provides to *clients*. Provide the name, title and telephone number of the *person* responsible for supervising the *supervised person's* advisory activities on behalf of your firm.**

Frank A. Monte, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor's compliance program and code of ethics of the Harbor Capital Advisory Services, Inc. supervised persons on a *ongoing* basis using various methods, including periodic inspection and review of client securities positions and transaction activity, obtaining certifications of compliance with company policies and procedures from those supervised, and obtaining and reviewing brokerage statements or transactions and holdings reports of the supervised persons. Frank A. Monte can be reached at (585) 425-4090.

**If you are registered or are registering with one or more *state securities authorities*, you must respond to the following additional Item.**

## **Item 7 Requirements for State-Registered Advisers**

**A. In addition to the events listed in Item 3 of Part 2B, if the *supervised person* has been *involved* in one of the events listed below, disclose all material facts regarding the event.**

**1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:**

- (a) an investment or an *investment-related* business or activity; (b) fraud, false statement(s), or omissions;**
- (c) theft, embezzlement, or other wrongful taking of property;**
- (d) bribery, forgery, counterfeiting, or extortion; or**
- (e) dishonest, unfair, or unethical practices.**

Mr. Smith has not been the subject of an arbitration claim.

**2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding* involving any of the following:**

- (a) an investment or an *investment-related* business or activity;**
- (b) fraud, false statement(s), or omissions;**
- (c) theft, embezzlement, or other wrongful taking of property;**
- (d) bribery, forgery, counterfeiting, or extortion; or**
- (e) dishonest, unfair, or unethical practices.**

Mr. Smith has not been the subject of a civil, self-regulatory organization or administrative proceeding.

**B. If the *supervised person* has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.**

Mr. Smith has not been the subject of a bankruptcy petition.