

## Item 1 - Cover Page

### Disclosure Brochure

**Harlow Wealth Management, Inc**  
(Formerly Known As “NW Tax & Wealth Advisory Group, Inc.”)

[www.harlowwealth.com](http://www.harlowwealth.com)

Main Office:

400 East Mill Plain Blvd., Suite 200  
Vancouver, WA 98660  
(360) 573-2522

Other Location:

10365 SE Sunnyside Road, Suite 150  
Clackamas, OR 97015  
(503) 427-2245

November 20, 2018

This brochure provides information about the qualifications and business practices of Harlow Wealth Management, Inc. (f/k/a/ “NW Tax & Wealth Advisory Group, Inc.”) If you have any questions about the contents of this brochure, please contact us at (360) 573-2522 or [danny@harlowwealth.com](mailto:danny@harlowwealth.com). 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 Harlow Wealth Management, Inc. is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Harlow Wealth Management, Inc. is a registered investment adviser. Registration of an investment adviser does not imply a certain level of skill or training.

## **Item 2 - Material Changes**

This Brochure, dated November 20, 2018 represents an amendment to the Brochure for Harlow Wealth Management, Inc. (formerly known as “NW Tax & Wealth Advisory Group, Inc.”)

Since the filing of the last annual amendment to the Brochure on March 29, 2018, we have made minor updates to the Brochure, but no material changes were made.

Pursuant to regulatory requirements, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge. Currently, our Brochure may be requested by contacting our Chief Compliance Officer at (360) 573-25225.

Additional information about the firm is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with the firm who are registered as investment adviser representatives of the firm.

### **Item 3 - Table of Contents**

Item 1 - Cover Page.....	i
Item 2 - Material Changes.....	ii
Item 3 - Table of Contents .....	iii
Item 4 - Advisory Business .....	1
Item 5 - Fees and Compensation.....	3
Item 6 - Performance-Based Fees and Side-By-Side Management .....	6
Item 7 - Types of Clients .....	7
Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss .....	7
Item 9 - Disciplinary Information.....	8
Item 10 - Other Financial Industry Activities and Affiliations .....	9
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	10
Item 12 - Brokerage Practices .....	10
Item 13 - Review of Accounts .....	12
Item 14 - Client Referrals and Other Compensation.....	13
Item 15 - Custody .....	14
Item 16 - Investment Discretion.....	14
Item 17 - Voting Client Securities.....	14
Item 18 - Financial Information .....	15
Brochures	

## Item 4 - Advisory Business

### Ownership/History

Harlow Wealth Management, Inc. (formerly known as “NW Tax & Wealth Advisory Group, Inc.”) is an investment adviser registered with the Securities and Exchange Commission<sup>1</sup>. Danny J. Harlow founded NW Tax & Wealth Advisory Group, Inc. in 2005 and changed the firm’s name to “Harlow Wealth Management, Inc.” in July of 2017. Mr. Harlow, Esther Harlow, and Christopher Harlow own Harlow Wealth Management Inc. Our business includes investment advisory and financial planning services, tax consultations, and the sale of insurance.

### Advisory Services

#### Financial Planning

Our financial planning services typically involve providing targeted services, such as analysis of taxes, investments, retirement distributions, retirement and estate planning. First, we meet with you to discuss your current financial situation, gathering information about your investment methodology, risk tolerance, income, tax bracket, liquidity, time horizons, etc. We then analyze your situation, which may include analyzing your current investment portfolio, preparing an analysis of your investment portfolio, classifying your portfolio into its current asset class allocation, and estimating a historic rate of return. We follow up by giving you a review of our findings. Throughout the process, we make certain assumptions regarding interest and inflation rates and the use of past trends and performance of the market and economy. We feel it’s important to remind our clients that past performance is in no way an indication of future performance, and that we do not offer any guarantees or promises that your financial goals and objectives will be met.

Harlow Wealth Management, Inc. can provide a comprehensive financial plan or a plan that is focused on specific areas. Either way, we design the plan to be consistent with your stated financial goals and objectives.

You are free to implement the financial plan through any investment adviser, insurance agent, or broker/dealer that you prefer and you are under no obligation to implement your plan through Harlow Wealth Management, Inc. or anyone recommended by NW Tax & Wealth Advisory Group. However, if you implement your plan’s investment management recommendations or insurance recommendations through Harlow Wealth Management, Inc., we may receive other compensation and benefits related to implementing the recommendations. Additional compensation may present a conflict of interest in that there is an incentive to make a recommendation based on the compensation and/or benefits received, rather than on your needs. We address this conflict through disclosures, such as this Disclosure Brochure or other materials discussing the products and/or services offered. For additional information, see “Advisory Business” above and “Other Financial Industry Activities and

---

<sup>1</sup> Registration as an investment adviser does not imply a certain level of skill or training.

Affiliations” below.

#### Investment Management

Harlow Wealth Management, Inc. offers ongoing investment management based on your individual needs and circumstances. Our investment management process includes an initial assessment, recommendations, implementation, monitoring, and ongoing management. We also meet with you periodically to proactively identify and plan for any changes that could influence your overall financial situation.

We often recommend one or more unaffiliated third party investment managers (“TPMs”) for investment management. TPMs invest your assets in portfolios modeled to be consistent with your investment objectives and financial needs. You are not obligated to accept our recommendation to use a particular TPM.

We review the TPMs’ backgrounds and consider factors, such as fees, reputation, performance, financial strength, management, price, reporting capabilities. We will present you with one or more recommendations based on your financial situation, goals, needs, and investment objectives. TPMs we currently refer include Global Financial Private Capital, LLC (“Global”) and Equis Capital Management, Inc. (“Equis”). Each recommended TPM is a registered investment adviser<sup>2</sup> who manages your investments in one or more of their model portfolios. Where applicable, you will be given the TPM’s written disclosure brochure describing its services and fees, among other things. In addition, we give you a separate written disclosure that describes our relationship with the TPM and compensation we receive from the TPM.

Generally, a TPM is responsible for portfolio management, portfolio design, best execution, portfolio reporting, trading, trade error resolution, and custodian reconciliations, but we may supplement your account with other holdings. Our agreements with TPMs usually require us to maintain a relationship with you, to ensure that information about your specific goals, financial situation and risk preference remain current, to assist you in determining appropriate allocation models, to review account activity periodically, to meet with you annually, and to respond to your inquiries.

We have also entered into a co-advisory relationship with AE Wealth Management, LLC (“AEWM”) to provide investment management services to our clients. This arrangement allows us to access model portfolios, model managers, strategists, third party money managers, trading services and investments through AEWM’s managed account program. As part of the AEWM program, you will give us and AEWM discretion to select third party, non-affiliated investment managers (“Model Managers”) or investment providers to design

---

<sup>2</sup> We will not refer a client to a TPM unless the TPM is registered, notice-filed, or exempt from registration as an investment adviser in the client’s state of residence.

and manage model portfolios for your assets. If we offer you services through AEWM, we will provide you with a copy of AEWM's disclosure brochure which contains a detailed description of AEWM's services.

#### Other Advisory Services

In the past, we offered a monitoring service for alternative investments recommended by us where appropriate to a client based on the client's individual needs and financial circumstances. While we no longer offer this service, we continue to monitor alternative investments for existing clients who engaged us for these services. We currently do not charge these clients a fee for the monitoring service.

We provide articles, e-newsletters, and e-seminars (at no cost) to anyone visiting our web site ([www.harlowwealth.com](http://www.harlowwealth.com)). Content is intended to be educational, to be timely, and to help readers understand their investment needs.

From time to time, Harlow Wealth Management, Inc. holds events designed to provide clients and prospective clients with information about investing, taxes, insurance, and other topics. There is no charge or obligation to those attending the events.

#### **Tailored Services**

We tailor all of our services to your stated goals, needs and objectives. You may impose restrictions on investing in certain securities or types of securities. We ask that you detail in writing any specific requirements before engaging our services. However, we reserve the right to decline an account if we feel the restriction(s) imposed unduly restrict our ability to manage the account.

#### **Wrap Fee Programs**

Although we do not sponsor a wrap fee program, we may delegate your account or refer you to a TPM that offers a wrap fee program. Information about a TPM's wrap fee program may be found in the applicable TPM's disclosure brochure, which is available upon request.

#### **Clients Assets Managed**

As of December 31, 2017, we managed \$103,300,000 of client assets on a discretionary and none on a non-discretionary basis.

## **Item 5 - Fees and Compensation**

#### **Financial Planning Fees**

Financial planning services are provided at no extra charge as part of ongoing investment management engagements.

## **Investment Management Fees**

When we manage your investments, investment management fees are generally charged at a rate of one percent (1.00%) per year, calculated as a percentage of assets under management. The negotiability of fees depends on the size and complexity of your account.

Fees may be charged monthly or quarterly, and may be charged in arrears or in advance, depending on the platform used. If billed in arrears, the fee will be based on account value as of the end of the applicable quarter as reported by the custodian. If billed in advance, the fee will be based on account value as of the end of the preceding quarter as reported by the custodian, with the initial fee of a partial quarter based on the account value as of the first day of management.

Fees are generally debited directly from your account by your account's custodian at the direction of you, us or the applicable platform provider.

You may be required to provide written authorization to your account's custodian in order for management fees to be deducted from your account. If your account does not have a sufficient cash or money market balance to cover the fees or is restricted from automatic debiting of fees, you may deposit additional funds (subject to certain restrictions for IRA accounts and Qualified Retirement Plans) or make payment in an alternative manner acceptable to Harlow Wealth Management, Inc. If you do not deposit additional funds or otherwise make the payment, securities in your account may be sold in an amount sufficient to cover the fees. Your account's custodian will reflect the amount of the deduction on your account's statement.

You have the right to terminate the Investment Management Agreement without penalty within five (5) business days after entering into it. Prepaid investment management fees will be refunded. After five (5) business days, you may terminate our services at any time by providing written notice to Harlow Wealth Management, Inc. For an account billed in advance, you will be entitled to a pro-rata refund of any prepaid fee based upon the number days remaining in the period after the effective date of the termination. For an account billed in arrears, you will be billed for the partial period. Your death will not terminate the agreement or authority granted to us until we have received actual written notification of your death.

In the event that a client is not completely satisfied with services provided by Harlow Wealth Management, Inc., the firm will refund up to the initial three months fees charged by Harlow Wealth Management, Inc. provided that a) the client provides written notice of their intent to move their accounts and provides a refund request within 15 days after the month's end of no later than the third month beginning on the date the client signs the NW Tax & Wealth client agreement, and b) accounts are moved within one month from the date of the written notice. Harlow Wealth Management, Inc. will not however refund fees charged by third party managers or other outside parties.

### **TPMs' Fees**

TPMs managing your investments usually charge fees based on the assets you place under their management, and this fee is separate from our fee detailed above. The amount of fees charged by TPMs, method of payment, and frequency of billing are disclosed in the TPM's written disclosure documents. These fees may be negotiable depending on the policies of the TPM. Although our compensation is separate, it may be deducted from your account and paid to us by the TPM. The TPM's written disclosure documents disclose other charges and practices associated with the management of your investments. Examples of these charges are custodial fees, deferred sales charges, if any, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, taxes on brokerage accounts and securities transactions. Some TPMs charge a fee for mailing paper account statements. Some TPMs begin charging advisory fees upon funding an account as opposed to waiting until management begins. We urge you to read the TPM's disclosure documents and ask us if you have any questions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a mutual fund's prospectus. Harlow Wealth Management, Inc. does not receive any of these commissions, charges, and/or fees. You have the right to terminate your agreement with a TPM without penalty within five (5) business days. Otherwise, termination of your agreement and the return of unearned prepaid fees are described in the TPM's disclosure documents may be terminated.

### **AEWM Program Fees**

When services are provided through AEW, our firm is allowed to set the investment management fee up to a maximum of 1.55% total fee on assets under management on an annual basis. The annual fee is generally billed monthly in arrears, but will be specified in your co-advisory agreement with AEW and our firm. A more detailed description of fees related to AEW's managed account program is located in AEW's disclosure brochure which will be provided to you if we offer you services through AEW. AEW and our firm will receive a portion of the fee as compensation for services.

Services provided through AEW's managed account program are offered both on a non-wrap fee basis and through a wrap fee program. If you choose to receive services on a non-wrap fee basis, you may pay separate commissions, ticket charges, and custodian fees for the execution of transactions in your account. These charges (if applicable) will be in addition to any investment management fee that you may pay to AEW and to our firm. If you choose to receive services through the wrap fee program, you will only pay fees based on assets under management and you will not pay a separate commission, ticket charge, or custodian fee, for the execution of transactions in your account.

### **Other Charges and Information**

We believe fees are competitive but you may find lower fees for comparable services elsewhere.

Harlow Wealth Management, Inc. shall not be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds invested by their



clients.

Fees for investment advisory services are generally separate and distinct from charges assessed by other parties, such as broker/dealers, custodians, mutual fund companies, annuity companies, etc., although some charges may be included when wrap programs are used. You will generally incur brokerage and other transaction costs charged by broker/dealers executing the transactions and custodians maintaining your assets. These costs are in addition to management fees and are non-negotiable. See “Item 12 Brokerage Practices” below for information about brokerage/custodial firms.

In the case of money market funds, annuities and mutual funds, the funds charge an advisory fee in addition to the management fee you pay to us. Some funds assess administrative fees and 12b-1 fees. These fees are described in the funds’ prospectuses or contracts. Likewise, when investing in exchange-traded funds (ETFs), you will bear the ETFs’ proportionate share of fees and expenses as an investor in the ETF. You do not pay these fees directly; rather these fees are deducted from the mutual fund or ETF’s assets.

For efficiency and ease of service, we will accept as valid any documents signed electronically by a client. Note that various state and federal laws establish that electronic signatures and documents carry the same weight and legal effect as traditional paper documents and handwritten signatures.

Harlow Wealth Management, Inc.’s representatives, as insurance agents, receive commissions from the sale of insurance to you. See “Item 10 Other Financial Industry Activities and Affiliations” below for additional information.

Please read all disclosure brochures and prospectuses for descriptions of all fees charged by portfolio managers, mutual funds, insurance companies, Harlow Wealth Management, Inc., and others to understand the total amount of fees to be paid. Similar advisory services may (or may not) be available from other investment advisers for similar or lower fees.

## **Item 6 - Performance-Based Fees and Side-By-Side Management**

We do not accept performance-based fees – that is, fees based on a share of capital gains or appreciation of the assets of a client.

We do not participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

## **Item 7 - Types of Clients**

We provide our advisory services to individual investors, pension and profit sharing plans, trusts, estates, charitable organizations, and businesses. Although we do not impose requirements for opening or maintaining an account, such as minimum account size, TPMs we recommend may require a minimum account balance to open or maintain an account and/or may charge a minimum annual fee.

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

### **Methods of Analysis**

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Fundamental Analysis – Involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Technical Analysis – Involves studying previous price patterns and trends in the financial markets to predict the direction of both the overall market and specific securities. Technical analysis offers many levels of short and long-term stock and bond market risk-management methods.

Long Term Purchases – Securities purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year.

Short Term Purchases – Securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

### **Investment Strategies**

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. Our strategies and investments may have unique and significant tax implications. Moreover, because of IRS regulations, custodians and broker-dealers report the cost basis of equities acquired in your accounts, defaulting to the FIFO accounting method for calculating the cost basis of your investments. If this is not the correct choice for you, you must request your account's custodian to change the method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method

cannot be changed after settlement.

For information regarding investment strategies and methods of analysis used by AEWM, Model Managers, or TPM's, please refer to the applicable ADV Part 2 Disclosure Brochure which is available upon request.

### **Risk of Loss**

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

We attempt to mitigate risks through diversification across multiple asset classes, managing accounts with discipline and resisting the temptation to react to short-term market fluctuations. We encourage you to discuss any concerns you may have with us.

Harlow Wealth Management, Inc. does not represent, warrant or imply that the services or methods of analysis employed by Harlow Wealth Management, Inc. or a TPM can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market advances, corrections or declines. Further, no guarantees of performance are offered.

If you have invested in an alternative investment program, depending on the type of alternative investment program and the manner in which it is offered to the public, transparent and clear disclosures may not be available because not all alternative investments are subject to the same disclosure requirements. Distributions are determined by the investment's managers, are not guaranteed and may exceed the program's operating cash flow. The use of leverage may be used to finance distributions to investors in addition to generally accepted uses of leverage. Earnings and profits may be taxed as ordinary income rather than as capital gains, depending on several factors. There may be a lack of a public trading market that could create illiquidity and valuation complexities. Early redemption of the investment is often restrictive and may be expensive. Issuer costs may be expensive. Rarely are alternative investments appropriate for short-term investors and even long-term investors must be willing to bear the risks of illiquidity.

### **Item 9 - Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that may be material to your evaluation of our firm or the integrity of our management. In July 2011, Oregon Department of Consumer and Business Services entered an order against Danny Harlow, alleging an unsuitable insurance recommendation. Mr. Harlow

agreed to a small monetary fine without contesting the allegations in an effort to avoid the costs associated with a protracted administrative proceeding.

## **Item 10 - Other Financial Industry Activities and Affiliations**

In addition to providing investment advisory services, Harlow Wealth Management, Inc. is also a tax consulting company and an insurance agency. Our representatives are licensed insurance agents who earn commissions and other revenue from the sale of insurance products. A conflict of interest exists because commissions can create a financial incentive to recommend insurance based on commissions earned rather than a recommendation based on the clients' interests. While we cannot eliminate this conflict, we alert you to its existence through this Disclosure Brochure. Further, we believe that our business activities complement and enhance our advisory services. For example, when you purchase insurance through Harlow Wealth Management, Inc., we have conducted a thorough review of the specific product recommended. We conduct a "reasonable-basis suitability assessment." This assessment includes examining the product's reputation, financial and management strength as well as the product's benefits and costs. If you purchase the product through another insurance agency, we may not be able to advise you of the product's attributes. In addition, if you purchase insurance through Harlow Wealth Management, Inc., we are able to monitor your insurance contract as needed. Before you purchase insurance products through Harlow Wealth Management, Inc., we will explain to you the reasons for our recommendation and provide you with details regarding our insurance agent's compensation. You are under no obligation to purchase insurance or avail yourself of our tax consultations.

When you decide to engage a TPM recommended by us, Harlow Wealth Management, Inc. will share compensation with the TPM that is based on a percentage of the assets managed by the TPM. Other benefits we receive from recommending a particular TPM may include research-related products and tools; consulting services; access to a trading desk serving adviser participants; the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client account information and activity. You should be aware, however, that the receipt of compensation and other economic benefits by our firm creates a potential conflict of interest that may directly or indirectly influence our recommendation for you to use a particular TPM. While we cannot eliminate this conflict of interest, we alert you to its existence so that you can evaluate any partiality shown in any recommendation of services. Further, you are under no obligation to conduct business with anyone recommended by us.

Global, Equis, and AEWM each provide a fee collection service to Harlow Wealth Management, Inc. for our clients who use our investment management services and maintain their accounts through a specific custodian. This creates a conflict of interest for Harlow Wealth Management, Inc., in that the fee collection service allows us to avoid certain regulatory requirements involved in invoicing clients and directly debiting client accounts for fees. Further, our

relationship with certain TPM's may provide Harlow Wealth Management, Inc. with access to certain custodian's institutional services to which we may not otherwise have access. The way we address this conflict is through disclosure in this Disclosure Brochure and by recognizing our fiduciary duty to clients as set forth in our Code of Ethics.

Our executive officers have a financial relationship in EQIS Holdings, Inc., the parent of Equis Capital Management, Inc. This relationship creates a conflict of interest when Equis Capital Management, Inc. is recommended as a TPM or if transactions in EQIS Holdings, Inc. are recommended. Harlow Wealth Management, Inc. addresses this conflict by (1) disclosure to clients and potential clients in this Disclosure Brochure; (2) comparing the benefits of other TPMs when considering Equis Capital Management, Inc. as a recommendation, documenting the comparison, and then making the appropriate recommendation based on the individual needs of the client; (3) performing periodic due diligence reviews of Equis Capital Management, Inc.; and (4) implementing a restricted period preventing the executive officers from selling EQIS Holdings, Inc. on a day during which any client has a pending transaction in the same security.

## **Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Harlow Wealth Management, Inc. has adopted a formal Code of Ethics. Our Code of Ethics includes guidelines for ethical and professional standards of conduct for our associated persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our associated persons are expected to adhere strictly to these guidelines.

We do not buy securities from or sell securities as principal to clients.

On occasion, we may buy or sell securities that we recommend to clients. This practice would create a conflict of interest if the transactions were structured to trade on the market impact caused by recommendations made to our clients. Our Chief Compliance Officer reviews our personal transactions quarterly. Our Code of Ethics requires him to pre-approve personal transactions in some cases. We believe that we have adopted sufficient controls so that our personal transactions are consistent with advice given to clients. A copy of the Code of Ethics will be provided to any client or prospective client upon request.

## **Item 12 - Brokerage Practices**

### **The Custodian and Brokers We Use**

Harlow Wealth Management, Inc. does not maintain custody of client assets, nor do our TPM's. Instead, we require all client assets be maintained in an account at a non affiliated "qualified custodian," generally a broker-dealer or bank. The custodian will hold your assets in a brokerage account and will be able to buy and sell securities on your behalf.

Whether assets are managed by us or a TPM, we will recommend that you use a particular custodian/broker, but you will ultimately decide whether to do so and will open your account by entering into an account agreement directly with them. We cannot actually open accounts for you, but we can assist you in opening an account at whatever custodian/broker you decide to use.

### **How We Select Custodians and Brokers**

When recommending a custodian or broker for accounts that we manage, we consider many different factors including quality of service, types of services offered, overall capability, execution quality, competitiveness of transaction costs, availability of investment research, reputation of the firm, and financial resources, among other things. In determining the reasonableness of a broker's compensation, we consider the overall cost to you relative to the benefits you receive, both directly and indirectly, from the broker.

For accounts managed by our TPM's, similar considerations are given, but please see the applicable TPM's Form ADV Part 2 Brochure for additional details.

### **Your Brokerage and Custody Costs**

Our clients receive various services directly from our custodians. For our clients' accounts that they maintain, our custodians generally do not charge separately for custody services but instead are compensated by charging commissions or other fees on trades that they execute or trades that are executed by other brokers to and from custodial accounts. Fees applicable to our client accounts are sometimes negotiated based on the condition that our clients collectively maintain a certain level of assets at a particular custodian. We feel this commitment benefits you because we expect the overall rates you pay will be lower than they might be otherwise. Since custodians often charge clients a fee for each trade that we have executed by a different broker-dealer, we have the primary custodian execute most trades in order to minimize your trading costs.

For information about brokerage and custodial costs of our TPM's, please see the applicable TPM's Form ADV Part 2 Brochure for additional details.

### **Products and Services Available to Us from Brokers/Custodians**

Our primary custodians provide us and our clients with access to its institutional brokerage services like trading, custody, reporting, and related services, many of which are not typically available to retail customers. Our custodians also make available various support services, some of which may help us manage or administer our clients' accounts, while others may help us manage and grow our business.

Other institutional brokerage services which benefit you directly include access to a broad range of investment products, execution of securities transactions, and asset custody. The investment

products available through our custodians include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Our custodians also make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both from custodians/brokers and from third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at a particular custodian. In addition to investment research, our custodians may also make available software and other technology that provide access to client account data, facilitates trade execution for multiple client accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

Our custodians also offer other services intended to help us manage and further develop our business. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

The availability of these services from our custodians benefit us because we do not have to produce or purchase them. Of course, this may give us an incentive to recommend that you maintain your account with a custodian based on our interests rather than yours, which is a potential conflict of interest. We believe, however, that our selection of our custodians and brokers is in the best interests of our clients, and is primarily supported by the scope, quality, and price of services provided and not the custodians' services that benefit only us.

For information about products and services made available to our TPM's by brokers and custodians, please see the applicable TPM's Form ADV Part 2 Brochure for additional details.

### **Aggregated Transactions**

If we decide to purchase or sell the same securities for several clients at approximately the same time, we might combine ("aggregate" or "batch") these orders. By aggregating orders of the same securities, we may be able to obtain a better overall execution price. We may be able to obtain lower transaction costs that might or might not have been obtained had multiple orders been placed independently. When aggregating, Fidelity generally averages price and transaction costs, allocating among clients as we have told them to do. We receive no additional compensation or remuneration resulting from the aggregation of transactions.

## **Item 13 - Review of Accounts**

Our investment adviser representatives review accounts periodically. The frequency and level of

review is determined by the complexity of your portfolio, changes in economic or market conditions, tax laws, and/or your individual situation. TPMs monitor accounts daily for trading and rebalancing purposes. Additional information about reviews conducted by TPM's may be found in the TPM's Form ADV Part 2 Disclosure Brochure, which is available upon request. The brokerage firm handling your account will send you account statements at least quarterly, but usually monthly. These account statements show money balances, investment values, and transactions. TPM's may also provide performance and or general market reports. Additional information about reports provided by TPM's may be found in the TPM's Form ADV Part 2 Disclosure Brochure, which is available upon request.

## **Item 14 - Client Referrals and Other Compensation**

### **Client Referrals**

We may compensate others for client referrals or we may be compensated for client referrals. In either case, Federal and State regulations require that we enter into a formal agreement, that the other party complies with state registration and qualification requirements, and that the fee paid or received is disclosed to clients and prospective clients. Regulations require that we provide additional disclosure to clients obtained through referrals who pay higher fees than clients not obtained through referrals.

In some instances, we may suggest the need for you to consult with an attorney, mortgage broker or other professional. We do not share in any fees you pay to these professionals.

Some of the professionals that we recommend will refer their clients to us. As a result, this creates an incentive on our part to refer clients to only those professionals that send us referrals, rather than to someone who may provide better services at lower cost. To address this conflict, we want you to understand:

- Harlow Wealth Management, Inc. does not accept any economic benefit from referring clients to another professional without first notifying you of such possibility. We act completely in a fiduciary capacity – putting your interests first.
- You are under no obligation to use any professional recommended by us.

### **Other Compensation**

Economic benefits that we receive from non-clients such as TPMs are described above in “Item 10 - Other Financial Industry Activities and Affiliations.”

The firm does not receive any sales award or prizes in connection with providing advisory services to clients.

The firm may however receive economic benefits from custodians in the form of the support



products and services that are made available to independent investment advisors. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12 above.

## **Item 15 - Custody**

Harlow Wealth Management, Inc. requires that clients' assets be held by a qualified custodian. Although we do not hold assets, we may have limited ability in some instances to trade on your behalf, to deduct our advisory fees from your account with your authorization, or to request disbursements to you.

You will receive account statement directly from your custodian at least quarterly, which will be sent to the email or postal mailing address you provide. We urge clients to carefully review custodial statements and compare them to any account reports that we might provide.

## **Item 16 - Investment Discretion**

### **Investment Management Services**

Harlow Wealth Management, Inc. will accept discretionary authority to manage securities accounts and in some cases to select TPM's and Model Managers on behalf of clients. We will also accept non discretionary accounts in certain instances.

When granted discretionary authority to manage accounts, the firm generally has the authority to determine which securities and the amounts that are bought or sold, and may delegate such authority to TPM's, AEWM, or Model Managers. Any discretionary authority accepted however is subject to the client's risk profile and investment objectives, and may be limited by any other limitations provided by the client in writing.

When managing non-discretionary accounts, the firm does not have the authority to make trade decisions without client consent, but will make trades on clients' behalf when directed to do so.

Harlow Wealth Management, Inc. will not exercise any discretionary authority until it has been given authority to do so in writing. Such authority is granted in the written agreement between Harlow Wealth Management, Inc. and the client, and in the written agreement with the applicable third party custodian. TPM's and Model Managers may also require separate written authorizations.

## **Item 17 - Voting Client Securities**

We do not accept authority to vote securities on your behalf. Your brokerage firm or custodian

sends proxies or other solicitations about your securities directly to you. If you have questions about a particular solicitation, you can ask us for advice, but you would not be obligated to follow our advice on voting your securities.

## **Item 18 - Financial Information**

Registered investment advisers are required in some cases to provide certain financial information and or disclosures about their financial condition. For example, if the firm requires prepayment of fees for six months in advance, has custody of client funds, or has a condition that is reasonably likely to impair its ability to meet its contractual commitments to its clients, it must provide financial information and make disclosures.

Harlow Wealth Management, Inc. does not require or accept payment of more than \$500 in fees six months or more in advance. Therefore, Harlow Wealth Management, Inc. is not required to include a balance sheet with this disclosure brochure.

Harlow Wealth Management, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients nor has it been the subject of a bankruptcy proceeding.