

Item 1: Cover Page

PERSONAL CFO SOLUTIONS, LLC.

Part 2A Appendix 1 of Form ADV:

Wrap Fee Program Brochure

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This Wrap Fee Program Brochure provides information about the qualifications and business practices of Personal CFO Solutions, LLC. If you have any questions about the contents of this Wrap Fee Program Brochure, please contact us at (908) 955-7055. 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 Personal CFO Solutions, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Registration as an investment adviser, or any reference to the firm being or the use of the term "registered", "registration" or "registered investment adviser" does not imply a certain level of skill or training.

Item 2: Material Changes

This Item discusses only the material changes that have occurred since the last annual update in March 2016. This Wrap Fee Program Brochure has no material changes.

This section includes only material changes. Personal CFO Solutions, LLC encourages all clients to review the entire Wrap Fee Program Brochure.

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Item 4: Services, Fees and Compensation

Personal CFO Solutions, LLC, (“Personal CFO”, “we”, “us” or “our”) offers a wrap fee account program, the “Personal CFO Managed Portfolios”. Personal CFO Managed Portfolios are managed on a discretionary basis by Personal CFO. The Personal CFO Managed Portfolios are designed by Personal CFO to meet several allocation and client objectives. Personal CFO Managed Portfolios may include the following portfolios: Hedged, Inflation Hedged, Stable, Conservative, Moderate, Growth, Sector Rotation, All Equity and Small Cap.

Personal CFO Managed Portfolios generally consist of investment company securities (such as mutual fund shares) and exchange traded funds (ETFs). They may consist of various equity securities (such as exchange-listed and securities traded over-the-counter) and/or United States government securities.

The annual fee for Personal CFO Managed Portfolios will be charged as a percentage of assets under management, which will generally be equal to 1% of assets in the portfolio. This wrap fee includes our management fee and the transactions costs for the purchase and sale of securities charged by the qualified custodian. The client is responsible for all other charges and fees.

The fees may be negotiable at Personal CFO’s sole discretion. The total fee is paid to Personal CFO as the investment advisor of the portfolio and sponsor of the wrap fee program. From this fee Personal CFO pays the above included fees to the custodian.

Wrap fee programs may cost the client more or less than purchasing such services separately. The cost of these services separately would depend on the portfolio's management fee, the frequency of trading in the portfolio, commission rates charged, and other associated fees.

The wrap fee includes only the management fee and transaction costs for the purchase and sale of securities. Clients may pay additional fees that are not included in the wrap fee. The wrap fee does not include the fees associated with the underlying investments. Mutual fund expenses, the fees and expenses imposed by mutual funds, are described in each fund’s prospectus, and will generally include a management fee, other fund expenses, and a possible distribution fee. The wrap fee does not include mark-ups, mark downs or spreads paid to market makers.

Personal CFO receives the fee for the management of the Personal CFO Managed Portfolio therefore we may have an incentive to recommend the wrap program.

Wrap Fee Accounts

Personal CFO Solutions, LLC offers a wrap fee account program, the “Personal CFO Managed Portfolio”. Personal CFO Managed Portfolios are managed on a discretionary basis by Personal CFO and are designed by Personal CFO to meet several allocation and client objectives. Personal CFO Managed Portfolios may include the following portfolios: Hedged, Inflation Hedged, Stable, Conservative, Moderate, Growth, All Equity, Sector Rotation and Small Cap. Personal CFO Managed Portfolios general consist of investment company securities (such as mutual fund shares) and exchange traded funds (ETFs) and may include equity securities (such as exchange-listed and securities traded over-the-counter) and United States government securities.

The management of wrap fee accounts differs from non-wrap fee accounts in that non wrap fee accounts may include other investments such as allocations to third party managers which are not available in our

wrap fee program. In addition, in wrap fee program, Personal CFO determines the allocation, types of investments and executes the transactions.

Personal CFO receives the wrap fee for the management services provided to Personal CFO Managed Portfolios.

Item 5: Account Requirements and Types of Clients

There are generally no minimum account size requirements to open or maintain a Personal CFO Managed Portfolio.

The Personal CFO Managed Portfolio clients are individuals, high net worth individuals, pension and profit sharing plans, trusts, and estates, corporations, and other businesses.

Item 6: Portfolio Manager Selection and Evaluation

Personal CFO acts as the portfolio manager for our wrap fee program described in this Wrap Fee Program Brochure. The purpose of our wrap fee program is to provide clients with our account management and include in that service certain transaction fees enumerated above. The individual managers of this program are John Vieira, Patrick Nolan and Bryan Landadio. There are no other or outside portfolio managers selected for our program. The portfolios are reviewed internally and with the clients to review performance. Account statements from the custodians show the accounts' value.

Personal CFO Managed Portfolio accounts will be monitored by one or more of John Vieira, Bryan Landadio and Patrick Nolan as part of an ongoing process while regular account reviews are conducted on a periodic basis and whenever there are significant economic events, changes in market conditions or important new developments concerning a security's effect on the client's account. The firm may contact Personal CFO Managed Portfolio clients to review their accounts.

Personal CFO is the portfolio manager for the Personal CFO Managed Portfolios and the portfolios are not reviewed by a third party. Personal CFO's operational infrastructure and internal controls are well understood and are currently in place for other strategies offered to clients. As a result, the review process generally focuses on the specifics of the investment strategy and any unique characteristics, risks of the investment strategy and communication with the clients.

For information about the conflicts associated with Personal CFO managing the Personal CFO Managed Portfolios, please see Item 4 in regards to compensation for the Wrap Fee Program. Personal CFO seeks to address these potential conflicts relating to management of the wrap account by disclosing this to clients so that they may consider the potential conflict.

Personal CFO's Advisory Business:

The Firm's Services

Personal CFO offers discretionary and non-discretionary portfolio management services, financial planning, and consulting services.

Discretionary or Non-Discretionary Portfolio Management Services

Personal CFO's portfolio management services involve providing discretionary and/or non-discretionary investment advice based on a client's individual investment objectives and financial situation on an ongoing and continuous basis. Personal CFO will interview clients and confirm their investor profile and risk tolerance. This profile will be openly communicated and discussed with the client at scheduled meetings. Clients may change their desired profile based upon market, economic and world events, as well as personal life events such as a pending retirement.

Using the determined client profile, the firm allocates client investable assets among various equity securities (such as exchange-listed and securities traded over-the-counter), investment company securities (such as mutual fund shares), United States government securities, and exchange traded funds (ETFs). In addition to the above securities, Personal CFO recommends that its clients allocate investment assets on a discretionary basis, among various mutual fund asset allocation models, underlying mutual funds, exchange-traded funds, and/or independent investment manager programs offered through one or more independent managers (the "Independent Manager(s)"). The client may be required to execute a separate written agreement with the Independent Manager(s) and may incur fees imposed directly by the Independent Manager(s).

Financial Planning and Consulting

Personal CFO's financial planning and consulting services are comprised of ongoing financial counseling services for clients which incorporate the following areas: investment planning; income tax planning and preparation; estate planning & wealth transfer planning; employee benefit elections; insurance reviews; financing of purchases; and cash flow modeling including retirement planning.

Personal CFO provides services to its client via meetings where financial exhibits are presented, discussed, and reviewed. Client meetings typically take place in person with the exception of geographic challenges that preclude face to face meetings. In those instances, teleconferences are utilized.

If requested by the client, Personal CFO may assist the client with the implementation of the financial plan while working with the client's attorney, accountant, and/or insurance agent. Personal CFO may also recommend the services of other professionals if asked by the client. The client is under no obligation to engage the services of any such recommended professional, and retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Personal CFO.

We may also provide various services relative to client assets not under Personal CFO's management, including reviewing and monitoring such assets, and various activities related to such services.

Pension Consulting

The firm may act as a pension consultant for various pension plans on a non-discretionary basis. In providing pension consulting services, the firm assists the client in determining risk tolerance and investment objectives that are appropriate for each plan.

Miscellaneous Information about the Firm's Services

In connection with the provision of Personal CFO's services, Personal CFO tailors its advisory services to the client's individual needs, and clients may impose reasonable restrictions on Personal CFO's services, which may include restrictions on investing in certain securities or types of securities.

Wrap Fee Accounts

Personal CFO Solutions, LLC is the sponsor and manager of a wrap fee account program known as the “Personal CFO Managed Portfolio”. Personal CFO Managed Portfolios are managed on a discretionary basis by Personal CFO and are designed by Personal CFO to meet several allocation and client objectives. Personal CFO Managed Portfolios may include the following portfolios: Hedged, Inflation Hedged, Stable, Conservative, Moderate, Growth, All Equity, Sector Rotation and Small Cap. Personal CFO Managed Portfolios generally consist of investment company securities (such as mutual fund shares) and exchange traded funds (ETFs) and may include equity securities (such as exchange-listed and securities traded over-the-counter) and United States government securities. The management of wrap fee accounts differs from non wrap fee accounts in that non wrap fee accounts may include other investments such as allocations to third party managers which are not available in our wrap fee program.

Personal CFO receives the wrap fee for the management services provided to Personal CFO Managed Portfolios.

Performance-Based Fees and Side-By-Side Management

Personal CFO does not charge performance-based fees or engage in side by side management.

Methods of Analysis and Investment Strategies

Methods of Analysis.

Personal CFO will utilize multiple sources including but not limited to Morningstar, Fidelity Advisor Solutions and other subscription services to receive timely and informative economic and market information. At times, this information, if deemed extremely relevant or informative, may be passed along to clients as a courtesy.

Investment Strategy

Personal CFO utilizes a primary strategy of long-term purchases and Independent Managers, but may utilize short-term purchases for tactical purposes. Long-term purchases are typically those purchases of securities that are held for at least a year. Short-term purchases are typically those purchases of securities that are held for less than a year. Both long-term and short-term purchases include various risks, including the loss of principal due to market events. Where Personal CFO uses an Independent Manager, it is also indirectly employing the investment strategies used by that Independent Manager, which poses various risks including a lack of transparency and compliance risks associated with the Independent Manager used.

Risk of Loss

Investing in securities involves risk of loss that each client should be prepared to bear.

Related Risks

The firm does not primarily recommend one type of security. Each security is subject to various risk such as market risks, inflation risks, currency risks, liquidity risks, financial risks and other general economic risks. There are also risks associated with various methods of analysis. The risks client’s investments are subject to, include but are not limited to:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security’s particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.

- *Inflation Risk*: When any type of inflation is present, a dollar will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk*: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk*: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk*: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk*: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk*: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- *Technical Analysis Risk*: Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. Technical analysis posits that at any point in time the market price movements and patterns represent the collective judgments of likely millions of market participants and are the best source for predicting short- to mid-term price movements. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time. The firm uses technical analysis (i.e., the analysis of historical and current market data into its investment decisions) general for only for short term trading.
- *Cyclical Analysis Risk*: Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit. The firm uses cyclical analysis general for only for short term trading.
- *Model and Third Party Model Risk*: Some short to intermediate term investment strategies utilized may rely on third party models and predictions, which may include technical analysis and/ or market indicators, with regard to the performance of the markets or particular trading instruments. The information generated by these third party models, may not be accurate because of imperfections in the models, their deterioration over time, or other factors, such as the quality of the data input into the model, which involves the exercise of judgment. Even if the third party model functions as anticipated, it cannot account for all factors that may influence the prices of the investments, such as event risk. As market dynamics shift over time, a previously highly successful model often becomes outdated or inaccurate. There can be no assurance that the firm will be successful in obtaining and / or maintaining effective models or in identifying when its models are no longer effective (at least before substantial losses are incurred).
- *Exchange Traded Funds Risk (ETFs)*: ETFs are typically investment companies that are legally classified as open end mutual funds or UITs. However, they differ from traditional mutual funds, in particular, in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly-traded companies and the market price for a share of an ETF may fluctuate from the value of its underlying securities. Consequently, ETF

shares may trade at a discount or premium to their net asset value. This difference between the bid price and the ask price is often referred to as the “spread”, which generally varies based on the ETF’s trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940, some ETFs, in particular those that invest in commodities, are not registered as an investment company.

- *Leverage Risk:* Leverage increases the potential magnitude of portfolio fluctuations. It magnifies investment risks and can exacerbate liquidity problems in market downturns. Leverage may also complicate a client's portfolio structure due to obligations to creditors and counterparties and it can increase the risk to a client or investment due to the actions of these parties. In particular, dependence on leverage creates the risk that the client will be unable to meet its obligations should access to credit become limited due to broader market conditions.
- *Non-investment or Cash Risk:* When holding cash as an investment, including U.S. Treasury bills and money market mutual funds the risk is losing ground to inflation and the opportunity cost of missing the returns available on other assets such as stocks or bonds. Some short term to intermediate term strategies utilized by the Firm may hold cash for periods of time while waiting to enter the market. The risk is that during this time the returns available if invested such as in stocks and bonds will be missed. In addition, you should be aware that money in money market funds usually is not insured. While such funds have rarely resulted in investor losses, the potential is always there.
- *Leveraged and Inverse ETFs, ETNs and Mutual Funds Risk:* Leveraged ETFs, ETNs and mutual funds, sometimes labeled “ultra” or “2x” for example, are designed to provide a multiple of the underlying index’s return, typically on a daily basis. Inverse products are designed to provide the opposite of the return of the underlying index, typically on a daily basis. These products are different from and can be riskier than traditional ETFs, ETNs and mutual funds. Although these products are designed to provide returns that generally correspond to the underlying index, they may not be able to exactly replicate the performance of the index because of fund expenses and other factors. This is referred to as tracking error. Continual resetting of returns within the product may add to the underlying costs and increase the tracking error. As a result, this may prevent these products from achieving their investment objective. In addition, compounding of the returns can produce a divergence from the underlying index over time, in particular for leveraged products. In highly volatile markets with large positive and negative swings, return distortions are magnified over time. Because of these distortions, these products should be actively monitored, as frequently as daily, and may not be appropriate as an intermediate or long term holding. To accomplish their objectives, these products use a range of strategies, including swaps, futures contracts and other derivatives. These products may not be diversified and can be based on commodities or currencies. These products may have higher expense ratios and be less tax efficient than more traditional ETFs, ETNs and mutual funds.
- *Tax Risks Related to Short Term Trading:* Clients should note that the Firm may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies.
- *Sector Rotation and Concentration Risks:* Because of their narrow focus, investments in one or limited sectors tend to be more volatile than investments that diversify across many sectors and companies. Client investments may be or become concentrated in a particular security, sector, limited sectors, industry, market, or country. Should such security, sector, limited sectors, industry, market or country become subject to adverse financial conditions, the clients’ assets shall not be afforded the protection otherwise available through greater diversification of its investments.
- *Information Risk:* All investment professionals rely on research in order to draw conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third-parties) data and analyses. Even an advisor who says they rely solely on proprietary research must still collect data from third-parties. This data, or outside research is

chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the advisor to reach satisfactory investment conclusions.

With respect to the use of Independent Managers; such an Independent Manager may have had historical success, but such success does not guarantee any future success. In addition, as the firm does not select the underlying investments that may be used by such an Independent Manager, one or more Independent Managers used by the firm to manage the client's assets may purchase the same security, increasing the risk to the client if that security were to fall in value.

Voting Client Securities

Personal CFO does not vote client proxies for client accounts. Therefore, although Personal CFO may provide investment advisory services relative to client investment assets, Personal CFO's clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings, class or mass actions, legal actions or other events pertaining to the client's investment assets. Personal CFO and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. A client may contact Personal CFO with questions regarding a particular solicitation.

Item 7: Client Information Provided to Portfolio Managers

With regards to Personal CFO Managed Portfolios; since Personal CFO is the portfolio manager we are already in direct contact with our clients and do not need to share client information with outside managers. New information provided by clients is updated promptly in our records.

Item 8: Client Contact with Portfolio Managers

There are no restrictions placed on a client's ability to contact and consult with the portfolio managers. Clients are free to contact the portfolio managers at any time.

Item 9: Additional Information

Disciplinary Information

Personal CFO does not have any information that is disclosable under this Item.

Other Financial Industry Activities and Affiliations

Other Registrations

See the disclosure to Item 5 above concerning the registration of John Vieira as a representative of Purshe Kaplan Sterling Investments, and the registration of John Vieira, Bryan Landadio, Daniel Field, Maryanne Mitchell and Patrick Nolan as insurance agents.

The firm's personnel, through their individual capacities away from the firm may recommend that a client buy insurance, or in the case of John Vieira variable insurance products. Those sales may result in additional compensation being paid to the applicable personnel connected with that sale.

In addition, Mr. Vieira, as a registered representative of Purshe Kaplan Sterling Investments may also receive additional ongoing 12b-1 fees for mutual funds purchased or held by clients from the mutual fund company during the period that the client maintains the mutual fund investment. Compensation to Mr. Vieira from Purshe Kaplan Sterling Investments may be more or less depending on the product or service he recommends.

The activities of Mr. Vieira, Landadio, Field, Nolan and Ms. Mitchell as insurance product agents and Mr. Vieira's activities as a registered representative represent a conflict of interest. They each have an incentive to recommend to a client that the client purchase insurance products (and in the case of Mr. Vieira, variable insurance products) based on their ability to receive compensation from any such purchases, rather than based on a clients' needs. Mr. Vieira also has a financial incentive to recommend a particular investment in mutual funds based on his receipt of 12b-1 fees. In an effort to address those conflicts, it is firm policy that any such transactions are on terms that are acceptable for the industry and that those transactions must be suitable for the client's needs. No client is required to purchase insurance products through any of the firm's associated persons, and each client has the option to purchase those products through other brokers or agents that are not affiliated with the firm.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

Personal CFO has adopted a Code of Ethics pursuant to SEC Rule 204A-1, which serves to establish a standard of business conduct for all of the firm's personnel based upon the fundamental principles of openness, integrity, honesty and trust. Personal CFO is a fiduciary and therefore has the responsibility to render professional, continuous, and unbiased investment advice. As a fiduciary, Personal CFO must act at all times in its client's best interest and must avoid or disclose conflicts of interest. It is the purpose of Personal CFO's Code of Ethics to emphasize and implement these fundamental principles within its operations.

Information concerning the identity of security holdings and financial circumstances of clients is to be confidential. Failure to comply with the Code of Ethics may result in disciplinary action, which may include termination of employment.

Personal CFO will provide a copy of the Code of Ethics to any client or prospective client upon request.

Investing by the Firm and its Personnel

Recommending the sale of insurance products for clients that may result in sales compensation to certain firm personnel.

The purchase or sale of the same securities as for the client Personal CFO and Personal CFO personnel may purchase, sell, or hold the same securities for each of its and their own accounts as are purchased or sold for client accounts. These investment activities may present a conflict of interest in the sense that it is remotely possible that Personal CFO's personnel may benefit financially from a transaction effected for a client account, although the volume of such securities transactions have not and do not rise to the level where any transaction in the account of either the firm or any firm personnel has any appreciable impact on the market value of a security. Nonetheless, the firm believes that it has addressed this conflict of interest through its internal compliance policies. Initially, each such person will be required to report to the Chief Compliance Officer of Personal CFO all securities transactions during the preceding quarter in which she or he had a direct or indirect beneficial interest. The firm addresses these potential conflicts of interest by instituting a standard of business conduct for all supervised persons. In addition, by prohibiting supervised persons from effecting certain securities transactions without obtaining pre-clearance from Personal CFO's Chief Compliance Officer and by reviewing personal securities transactions reports filed by supervised persons for potential conflicts of interest. Lastly, Personal CFO requires that all personnel act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to termination.

The purchase or sale of same securities at or about the same time as in a client's account

Personal CFO, and/or any person related to Personal CFO, may recommend securities to clients, or buy or sell securities for client accounts, at or about the same time that Personal CFO or the person related to Personal CFO buys or sells the same securities for the account of Personal CFO or Personal CFO's related person. This presents a conflict of interest because Personal CFO or the related person may benefit financially as a result of transactions in that same security that occur in the client account. Similarly, the value of the security held in the client's account may be detrimentally impacted by transactions in that same security that occur in Personal CFO's account or the account of Personal CFO's related person.

The firm believes that it has addressed this conflict of interest through its internal compliance policies.

Review of Accounts

Account Reviews

Discretionary and Non-Discretionary Portfolio Management Services

Each of Personal CFO's accounts will be monitored by one or more of John Vieira, Bryan Landadio and Patrick Nolan as part of an ongoing process while regular account reviews are conducted on a periodic basis, and whenever significant economic events, changes in market conditions, or important new developments arise concerning a security's effect on the client's account. The firm may contact ongoing investment advisory clients to review their accounts.

Account Reports

Discretionary and Non-Discretionary Portfolio Management Services

Clients should receive written reports and confirmations of all transactions directly from the broker-dealer or custodian for the client accounts. Personal CFO may also provide a report to clients that may include such relevant account and/or market-related information such as an inventory of account holdings and

account performance. Any such report is provided as an accommodation only. Clients are urged to compare custodial statement with Personal CFO reports and rely solely upon the reports issued by the broker-dealer/custodian of the assets.

Financial Planning and Consulting Services

Personal CFO may provide reports to each client summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by Personal CFO.

Pension Consulting Services

Personal CFO will not provide any regular reports to pension consulting services clients.

Client Referrals and Other Compensation

Non-Clients providing an Economic Benefit to Personal CFO

Personal CFO may receive research and other benefits from a broker-dealer in connection with execution of client securities transactions. Please also see the discussion in Item 9 concerning compensation payable to the firm's personnel arising out of their activities as either registered representatives or insurance agents, and the discussion concerning the receipt of 12b-1 mutual fund distribution fees.

In addition, the firm has received additional monetary compensation from Fidelity Investment Brokerage Services to assist it with the initial tasks of establishing its business. Each client should be aware that the receipt of such compensation by the firm from Fidelity creates a conflict of interest since this benefit may influence the firm's choice of broker-dealer over another broker-dealer that does not furnish similar benefits. The firm believes that it has addressed the conflict because Personal CFO's clients do not pay more for investment transactions effected and/or assets maintained at Fidelity, a particular broker-dealer or custodian as result of Personal CFO's receipt of such compensation. Personal CFO has not made any commitment to invest any specific amount or percentage of client assets in any specific Fidelity product as a result of Personal CFO receiving these benefits.

Financial Information

Personal CFO does not have any financial condition to disclose that is reasonably likely to impair the ability of the firm to meet contractual commitments to clients.