

Boston Harbor Wealth Advisors, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: January 13, 2017

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Boston Harbor Wealth Advisors, LLC (“BHWA” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (978) 767-8667.

BHWA is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through BHWA to assist you in determining whether to retain the Advisor.

Additional information about BHWA and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD number - **282486**.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of BHWA.

BHWA believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. BHWA encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

- Boston Harbor Wealth Advisors, LLC is transitioning as a state registered advisor to an advisor with the U.S. Securities and Exchange Commission.
- Matthew Davis has transitioned out of his role of Chief Compliance Officer and Ryan Hendrickson is now taking over this role with the Advisor.
- The Advisor has amended their fee schedules for the various services that they provide. Please refer to Item 5 for the full breakdown.
- The Advisor has added an additional service of annual financial planning services. Please refer to Item 5 for compensation breakouts.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of BHWA.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD number - **282486**. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (978) 767-8667.

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Item 4 – Advisory Services

A. Firm Information

Boston Harbor Wealth Advisors, LLC (“BHWA” or the “Advisor”) is a registered investment advisor located in the Commonwealth of Massachusetts, which is organized as a Limited Liability Company (“LLC”) under the laws of Massachusetts. BHWA was founded in June 2015, and is owned by Matthew A. Davis (Principal), Ryan D. Hendrickson (Principal and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by BHWA.

B. Advisory Services Offered

BHWA offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and retirement plans in the Commonwealth of Massachusetts and other states (each referred to as a “Client”).

Investment Management Services

BHWA provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. In certain instances, BHWA may provide its services on a non-discretionary basis. BHWA works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy.

BHWA will then construct a portfolio utilizing mutual funds, exchange-traded funds (“ETFs”) and /or individual equity and fixed income securities. The Advisor may also utilize covered options and other types of investments, as appropriate, to meet the needs of a particular Client.

BHWA’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year for reason that include, but are not limited to: changes in Client objectives; account inflows/outflows; security fundamentals and/or market conditions. The first step of the BHWA investment process is to determine the strategic asset allocation targets. Once BHWA establishes the long-term framework, it’s determined if the Advisor should tactically adjust the allocation targets based on the current market environment and short-term economic outlook. BHWA will construct, implement and monitor the portfolio in connection with the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

BHWA evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. BHWA may recommend, on occasion, redistributing investment allocations to diversify the portfolio. BHWA may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. BHWA may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

BHWA will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will BHWA accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated account at the Custodian, pursuant to the terms of the investment advisory agreement.

Notice to California Clients: Pursuant to California Code of Regulations Section 260.238(k), the Advisor, has disclosed all material conflicts of interests that could reasonably be expected to impair the rendering of unbiased and objective advice.

Financial Planning Services

BHWA will typically provide a variety of financial planning services to Clients, pursuant to a written financial planning agreement. Services are offered in a variety of areas and are often tailored to the Client's needs, goals, and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. BHWA may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

Retirement Plan Advisory Services

BHWA provides 3(21) retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Employee Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Support
- Investment Management
- Performance Reports
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Certain of these services are provided by BHWA serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of BHWA's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

C. Client Account Management

Prior to engaging BHWA to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – BHWA in connection with the Client, will develop an investment strategy targeted to achieve the Client's investment goals and objectives.
- Asset Allocation – BHWA will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.

- Portfolio Construction – BHWA will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – BHWA will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

BHWA typically excludes the securities transaction fees for Client accounts as part of its overall investment advisory fee pursuant to the terms of the Raymond James Financial Services Inc. Wrap Fee Brochure. (See Item 5 – Fees and Compensation below). The inclusion of these securities transaction costs into the investment advisory fee is generally considered a “wrap fee program”. While traditional wrap fee programs often have a rigid set of investment options and uniform trading practices, BHWA customizes its investment advisory services for each of its Clients. The Raymond James Financial Services Inc. Wrap Fee Program merely provides a structure for which BHWA may provide its investment management services under a single annualized advisory fee. A copy of the Raymond James Financial Services Inc. Wrap Fee Brochure will also be provided to Clients.

E. Assets Under Management

As of November 10, 2016, BHWA manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$104,079,854
Non-Discretionary Assets	--
Total	\$104,079,854

Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of BHWA and the Client.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees range from 0.25% to 2.25% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

Investment advisory fees in the first quarter of service are prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by BHWA will be independently valued by the designated Custodian. BHWA will not have the authority or responsibility to value portfolio securities.

Financial Planning Services

BHWA offers financial planning services either on an hourly basis, fixed rate or on an annual retainer. Hourly engagements are billed at a rate of up to \$500 per hour based on the scope, duration and complexity of services. Fixed fee engagements generally range from \$500 to \$10,000. Annual retainer fees range from \$500 to \$10,000 a year. Fees may be negotiable at the sole discretion of the Advisor. For hourly and fixed fee engagements, an estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

The financial planning fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client.

Retirement Plan Advisory Services

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Retirement plan advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. 3(21) Retirement plan advisory fees range from 0.30% to 1.00%. Fees are based on the market value of assets in the plan on the last day of the prior calendar quarter. Fees are negotiable based on the size and complexity of the services provided to the Plan.

Notice to California Clients: Pursuant to California Code of Regulations Section 260.238(j), the Advisor discloses that the Client may be able to obtain similar services from other services providers for a lower fee.

B. Fee Billing

Investment Management Services

Investment advisory fees will be calculated by service agents engaged by the Advisor and deducted from the Client account[s] at the Custodian. The service agents will generate the invoice/instructions for the deduction of fees from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with BHWA at the end of the prior quarter. The Client will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor, or its delegate, will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement. The Clients shall provide written authorization permitting BHWA to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Financial Planning Services

Hourly financial and fixed rate planning fees are invoiced up to fifty percent (50%) upon execution of the financial planning agreement and the remaining balance upon the completion of the agreed upon deliverable[s]. Annual retainer financial planning fees are invoiced by the Advisor on a monthly basis in advance of providing services with up to \$1,000 due upon execution of the financial planning agreement and the remaining balance billed monthly.

Retirement Plan Advisory Services

Fees may be deducted from the accounts of the Plan Participants or paid by the Plan Sponsor.

C. Other Fees and Expenses

For Clients in the BHWA Wrap Fee Program, all normal custodial and securities transaction fees charged by the Custodian are included in the Client's investment advisory fee as noted above. The Client will be responsible for securities transaction fees for Client-directed trades.

In addition, all fees paid to BHWA for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of BHWA, but would not receive the services provided by BHWA which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by BHWA to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Investment Management Services

BHWA is compensated for its investment management services in advance of the calendar quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's consent.

Financial Planning Services

The Advisor may be partially compensated for its financial planning services at the start of an engagement. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. In addition, the Client may terminate the agreement within five (5) business days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, any unearned, prepaid financial planning fee will be promptly refunded to the Client. The Client's financial planning agreement with the Advisor is non-transferable without the Client's consent.

Retirement Plan Advisory Services

Fees for retirement plan advisory services are billed at the end of each calendar quarter, after services are rendered. Either party may request to terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for advisory fees up to and including the effective date of termination. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's consent.

E. Compensation for Sales of Securities

BHWA, as a registered investment advisor does not buy or sell securities to earn commissions, other than the investment advisory fees noted above.

Certain Supervised Persons of BHWA may also be a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA (CRD No. 6694), member FINRA, SIPC. In one's separate capacity as a RR of RJFS, the Supervised Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation[s] provided by a Supervised Person of BHWA. The Advisor will not earn ongoing investment advisory fees in connection with any services implemented in a Supervised Person's separate capacity as a RR with RJFS where a commission is earned. Compensation earned by an IAR in one's capacity as a registered representative is separate and in addition to BHWA's advisory fees. This practice presents a conflict of interest because Supervised Persons who are registered representatives may have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on a Client's needs. BHWA mitigates this conflict in two ways. First, Clients are under no obligation, contractually or otherwise, to purchase securities products through any Supervised Person of the Advisor. Second, BHWA will not charge an ongoing investment advisory fee on any assets implemented in the separate capacity of one of our Supervised Persons. Please see Item 10.

Certain Supervised Persons may also be licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products. Please see Item 10.

Item 6 – Performance-Based Fees and Side-By-Side Management

BHWA does not charge performance-based fees for its investment advisory services. The fees charged by BHWA are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

BHWA does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

BHWA provides investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and retirement plans. The relative percentage of each type of Client is available on BHWA's Form ADV Part 1. These percentages will change over time. BHWA generally does not impose a minimum size for establishing a relationship.

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

A. Methods of Analysis

BHWA employs fundamental, technical and other analysis methods in developing investment strategies for its Clients. Research and analysis from BHWA is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, BHWA generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. BHWA will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, BHWA may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. BHWA will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Technical analysis is used for analyzing various economic and market trends. These trends, both short- and long-term, are used for determining specific trade entry and exit points and broad economic analysis. These trends may include put/call ratios, pricing trends, moving averages, volume, and changes in volume, among many others. These indicators do not speak to the financial health of a particular issuer. Rather, indicators are used to gauge market sentiment regarding a given issue. Technical analysis will be used primarily for the timing of a particular trade, and not security selection.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. The following are additional investment risks that Client's should understand.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

Frequent Trading

Frequent trading in securities can result in higher transaction costs in the Client's account[s]. For taxable accounts, frequent trading can also result in taxable transactions each year that would not be present in a buy-and-hold strategy. There are no guarantees that a frequent trading strategy will correctly time purchases and sales of any particular security.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving BHWA or any of its Supervised Persons. BHWA and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD# **282486**. In addition, Clients may also obtain information relating to the disciplinary history of any investment advisor representative conducting business in Massachusetts by contacting the Commonwealth of Massachusetts Securities Division at (617) 727-3548.

Item 10 – Other Financial Industry Activities and Affiliations

The Advisor is not registered as a broker-dealer, futures commission merchant, commodity pool operator or commodity-trading advisor.

Affiliation With Raymond James

Certain Supervised Persons of BHWA may also be an investment advisor representative ("IAR") of Raymond James Financial Services Advisors, Inc. ("RJFSA"), a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). In one's separate capacity as an IAR of RJFSA, the Supervised Person will receive advisory fees for Clients whose accounts and relationships are serviced under RJFSA. The Supervised Person will not receive ongoing investment advisory fees under BHWA fees for these accounts.

Certain Supervised Persons of BHWA may also be a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA (CRD No. 6694), member FINRA, SIPC. In one's separate capacity as a RR of RJFS, the Supervised Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation[s] provided by a Supervised Person of BHWA. The Advisor will not earn ongoing investment advisory fees in connection with any services implemented in a Supervised Person's separate capacity as a RR with RJFS where a commission is earned.

Insurance Agency Affiliations

Certain Supervised Persons of the Advisor are also licensed insurance professionals. Implementations of insurance recommendation are separate and apart from a Supervised Person's role with BHWA. As an insurance professional, the Supervised Persons will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Supervised Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning or ongoing advisory fees, but will be excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or any of its Supervised Persons.

Selection of Other Advisors

BHWA does not select other advisors for its Clients and therefore has no disclosure to make regarding this Item.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

BHWA has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with BHWA (our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. BHWA and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of BHWA associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (978) 767-8667.

B. Personal Trading with Material Interest

BHWA allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. BHWA does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. BHWA does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

BHWA allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of BHWA may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by BHWA requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information. In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside business activities of Supervised Persons, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

D. Personal Trading at Same Time as Client

While BHWA allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. At no time will BHWA, or any Supervised Person of BHWA, transact in any security that would knowingly be to the detriment of any Client.

Notice to California Clients: BHWA represents that all material conflicts of interest that could affect the judgment or ability to provide unbiased advice by the Advisor or its Supervised Persons pursuant to CCR Section 260.238(k) have been disclosed.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

BHWA does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will contract directly with the broker-dealer or custodian as its “qualified custodian” (herein the “Custodian”) to safeguard Client assets and authorize BHWA to direct trades to the Custodian as agreed in the investment advisory agreement. The Advisor recommends that Clients establish their account[s] at Raymond James. Due to the affiliation with Raymond James, the Advisor is only permitted implement its investment management services if the Client elects to engage Raymond James as its Custodian. If a Client elects another provider to serve as the Custodian, BHWA will not be able to trade in the Client’s account[s]. Directing trades to a single broker-dealer/custodian may result in less favorable execution than would otherwise be obtained. BHWA does not have the discretionary authority to negotiate commissions on behalf of its Clients on a trade-by-trade basis. BHWA maintains an institutional relationship with Raymond James, whereby the Advisor receives economic benefits from Raymond James (Please see Item 14 below.). Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. BHWA does not participate in soft dollar programs sponsored or offered by Raymond James. However, as an institutional advisor on the Raymond James platform, the Advisor does receive economic benefits as noted in item 14 below.

2. Brokerage Referrals - BHWA does not receive any compensation from any third party, including Raymond James, in connection with establishing a brokerage account. The Advisor’s fees are discussed in Item 5.

3. Directed Brokerage - All Clients are serviced on a “directed brokerage basis”. BHWA will place trades within the account[s] established by the Client at Raymond James (the Custodian). All trades are executed within their respective brokerage account[s] at Raymond James. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). BHWA does not select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. All trading costs are determined solely by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results, taking into account such factors as execution price, size of order, difficulty of execution, confidentiality, and/or the skill required to execute the transaction. BHWA will execute all transactions through the Custodian. BHWA is not authorized to trade away from the Custodian using outside broker-dealers. BHWA may aggregate orders in a block trade or trades when securities are purchased or sold for multiple discretionary accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Principals of BHWA. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify BHWA if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance, via email or written communication, depending on the Clients preference.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by BHWA

BHWA does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. However, certain Supervised Persons may receive commissions in their separate capacity as registered representatives of RJFS. Please see Item 10.

BHWA may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, BHWA may receive referrals of new Clients from a third-party. However at no time with BHWA be compensated for these referrals.

Participation in Institutional Advisor Platform

As noted in Item 10, certain Supervised Persons of BHWA are also registered with RJFSA and RJFS. As a result of this relationship, the Advisor receives access to software and related support from these entities. The receipt of economic benefits from these entities results in economics benefits to the Advisor.

The Advisor may receive the following benefits from these entities: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

B. Client Referrals from Solicitors

BHWA does not engage paid solicitors for Client referrals.

Item 15 – Custody

BHWA does not accept or maintain custody of any Client accounts, except for the authorized deduction of its investment advisory fee. The Client must place investment assets with Raymond James as the Client's "qualified custodian". BHWA encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

Item 16 – Investment Discretion

BHWA, through the terms of the investment advisory agreement, will generally have discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by BHWA.

Item 17 – Voting Client Securities

BHWA does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither BHWA, nor its management, have any adverse financial situations that would reasonably impair the ability of BHWA to meet all obligations to its Clients. Neither BHWA, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. BHWA is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

Form ADV Part 2B – Brochure Supplement

for

Matthew A. Davis
Principal

Effective: January 13, 2017

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Matthew A. Davis (CRD# **4667592**) in addition to the information contained in the Boston Harbor Wealth Advisors, LLC ("BHWA" or the "Advisor") (CRD # 282486) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the BHWA Disclosure Brochure or this Brochure Supplement, please contact us at (978) 767-8667.

Additional information about Mr. Davis is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Matthew A. Davis, born in 1980, serves as a Principal of BHWA. Mr. Davis earned a Bachelors Degree in Economics and Politics from Colgate University in 2003. Additional information regarding Mr. Davis' employment history is included below.

Employment History:

Principal, Boston Harbor Wealth Advisors, LLC	12/2015 to Present
Financial Advisor, Raymond James Financial Services Advisors, Inc. and Raymond James Financial Services, Inc. (d/b/a Minutemen Wealth Management)	09/2015 to Present
Complex Director, Ameriprise Financial Services, Inc.	02/2011 to 09/2015
Branch Manager & Senior Financial Advisor, Ameriprise Financial Services, Inc.	01/2009 to 02/2011
District Manager, Ameriprise Financial Services, Inc.	09/2005 to 01/2009
Financial Advisor, Ameriprise Financial Advisors	08/2003 to 08/2005

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Davis. Mr. Davis has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Davis.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Davis.***

However, we do encourage you to independently view the background of Mr. Davis on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his name or by his Individual CRD# **4667592**.

Item 4 – Other Business Activities

Affiliation With Raymond James

Mr. Davis is also an investment advisor representative ("IAR") of Raymond James Financial Services Advisors, Inc. ("RJFSA"), a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Mr. Davis is also a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA, SIPC.

In his separate capacities as an IAR of RJFSA, Mr. Davis will receive advisory fees for Clients whose accounts and relationships are serviced under RJFSA. Mr. Davis will not receive ongoing investment advisory fees under BHWA fees for these accounts where a commission is earned.

Insurance Agency Affiliations

Mr. Davis is also a licensed insurance professional. Implementations of insurance recommendation are separate and apart from Mr. Davis' role with BHWA. As an insurance professional, Mr. Davis will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Mr.

Davis is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning or advisory fees, but will be excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Davis.

Item 5 – Additional Compensation

Mr. Davis has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Davis serves as a Principal of BHWA and is supervised by Ryan Hendrickson, the Chief Compliance Officer. Mr. Hendrickson can be reached at (978) 767-8667.

BHWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of BHWA. Further, BHWA is subject to regulatory oversight by various agencies. These agencies require registration by BHWA and certain of its Supervised Persons. As a registered entity, BHWA is subject to examinations by regulators, which may be announced or unannounced. BHWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Ryan D. Hendrickson
Principal and Chief Compliance Officer

Effective: January 13, 2017

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ryan D. Hendrickson (CRD# **5235332**) in addition to the information contained in the Boston Harbor Wealth Advisors, LLC (“BHWA” or the “Advisor”) (CRD # 282486) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the BHWA Disclosure Brochure or this Brochure Supplement, please contact us at (978) 767-8667.

Additional information about Mr. Hendrickson is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Ryan D. Hendrickson, born in 1984, serves as the Principal and Chief Compliance Officer of BHWA. Mr. Hendrickson earned a Bachelor of Arts in Economics from Wesleyan University in 2007. Mr. Hendrickson attended the Business Bridge Program from Dartmouth College - The Tuck School of Business at Dartmouth in 2006. Additional information regarding Mr. Hendrickson's employment history is included below.

Employment History:

Principal and Chief Compliance Officer, Boston Harbor Wealth Advisors, LLC	12/2015 to Present
Financial Advisor, Raymond James Financial Services Advisors, Inc. and Raymond James Financial Services, Inc. (d/b/a Boston Harbor Wealth Advisors)	07/2015 to Present
Financial Advisor, Associate Manager and Associate Vice President, Ameriprise Financial Services, Inc.	09/2007 to 07/2015

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Hendrickson. Mr. Hendrickson has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Hendrickson.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Hendrickson.***

However, we do encourage you to independently view the background of Mr. Hendrickson on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his name or by his Individual CRD# **5235332**.

Item 4 – Other Business Activities

Affiliation With Raymond James

Mr. Hendrickson is also an investment advisor representative ("IAR") of Raymond James Financial Services Advisors, Inc. ("RJFSA"), a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Mr. Hendrickson is also a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA, SIPC.

In his separate capacities as an IAR of RJFSA, Mr. Hendrickson will receive advisory fees for Clients whose accounts and relationships are serviced under RJFSA. Mr. Hendrickson will not receive ongoing investment advisory fees under BHWA fees for these accounts where a commission is earned.

Insurance Agency Affiliations

Mr. Hendrickson is also a licensed insurance professional. Implementations of insurance recommendation are separate and apart from Mr. Hendrickson's role with BHWA. As an insurance professional, Mr. Hendrickson will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Mr. Hendrickson is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning or advisory fees, but will be excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Hendrickson.

Item 5 – Additional Compensation

Mr. Hendrickson has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Hendrickson serves as a Principal and the Chief Compliance Officer of BHWA. Mr. Hendrickson can be reached at (978) 767-8667.

BHWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of BHWA. Further, BHWA is subject to regulatory oversight by various agencies. These agencies require registration by BHWA and certain of its Supervised Persons. As a registered entity, BHWA is subject to examinations by regulators, which may be announced or unannounced. BHWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Samuel R. Chamberlain
Senior Vice President and Financial Advisor**

Effective: January 13, 2017

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Samuel R. Chamberlain (CRD# **5532060**) in addition to the information contained in the Boston Harbor Wealth Advisors, LLC (“BHWA” or the “Advisor”) (CRD # 282486) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the BHWA Disclosure Brochure or this Brochure Supplement, please contact us at (978) 767-8667.

Additional information about Mr. Chamberlain is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Samuel R. Chamberlain, born in 1986, serves as a Senior Vice President and Financial Advisor of BHWA. Mr. Chamberlain earned a Bachelors of Science in Business Administration from Suffolk University in 2008. Additional information regarding Mr. Chamberlain's employment history is included below.

Employment History:

Senior Vice President and Financial Advisor, Boston Harbor Wealth Advisors, LLC	12/2015 to Present
Senior Vice President, Financial Advisor, Raymond James Financial Services Advisors, Inc. and Raymond James Financial Services, Inc. (d/b/a Boston Harbor Wealth Advisors)	07/2015 to Present
Financial Advisor, Ameriprise Financial Services, Inc.	05/2008 to 07/2015
Bartender, Beacon Hill Pub	10/2006 to 09/2009

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Chamberlain. Mr. Chamberlain has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Chamberlain.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Chamberlain.***

However, we do encourage you to independently view the background of Mr. Chamberlain on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his name or by his Individual CRD# **5532060**.

Item 4 – Other Business Activities

Affiliation With Raymond James

Mr. Chamberlain is also an investment advisor representative ("IAR") of Raymond James Financial Services Advisors, Inc. ("RJFSA"), a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Mr. Chamberlain is also a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA, SIPC.

In his separate capacities as an IAR of RJFSA, Mr. Chamberlain will receive advisory fees for Clients whose accounts and relationships are serviced under RJFSA. Mr. Chamberlain will not receive ongoing investment advisory fees under BHWA fees for these accounts where a commission is earned.

Item 5 – Additional Compensation

Mr. Chamberlain has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Chamberlain serves as a Senior Vice President and Financial Advisor for BHWA and is supervised by Ryan Hendrickson, the Chief Compliance Officer. Mr. Hendrickson can be reached at (978) 767-8667.

BHWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of BHWA. Further, BHWA is subject to regulatory oversight by various agencies. These agencies require registration by BHWA and certain of its Supervised Persons. As a registered entity, BHWA is subject to examinations by regulators, which may be announced or unannounced. BHWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Philip G. Murray Jr.
Senior Vice President and Financial Advisor

Effective: January 13, 2017

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Philip G. Murray Jr. (CRD# **867694**) in addition to the information contained in the Boston Harbor Wealth Advisors, LLC (“BHWA” or the “Advisor”) (CRD # 282486) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the BHWA Disclosure Brochure or this Brochure Supplement, please contact us at (978) 767-8667.

Additional information about Mr. Murray is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Philip G. Murray Jr., born in 1950, serves as a Senior Vice President and Financial Advisor of BHWA. Mr. Murray earned a Bachelor of Science in Business from Northeastern University in 1975. Additional information regarding Mr. Murray Jr.'s employment history is included below.

Employment History:

Senior Vice President and Financial Advisor, Boston Harbor Wealth Advisors, LLC	12/2015 to Present
Financial Advisor, Raymond James Financial Services Advisors, Inc. and Raymond James Financial Services, Inc. (d/b/a Boston Harbor Wealth Advisors)	07/2015 to Present
Financial Advisor, Ameriprise Financial Services, Inc.	06/2008 to 07/2015
Financial Advisor, RBC Capital Markets Corporation	12/2005 to 07/2008

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Murray. Mr. Murray has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Murray.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Murray.***

However, we do encourage you to independently view the background of Mr. Murray on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his name or by his Individual CRD# **867694**.

Item 4 – Other Business Activities

Affiliation With Raymond James

Mr. Murray is also an investment advisor representative ("IAR") of Raymond James Financial Services Advisors, Inc. ("RJFSA"), a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Mr. Murray is also a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA, SIPC.

In his separate capacities as an IAR of RJFSA, Mr. Murray will receive advisory fees for Clients whose accounts and relationships are serviced under RJFSA. Mr. Murray will not receive ongoing investment advisory fees under BHWA fees for these accounts where a commission is earned.

Insurance Agency Affiliations

Mr. Murray is also a licensed insurance professional. Implementations of insurance recommendation are separate and apart from Mr. Murray's role with BHWA. As an insurance professional, Mr. Murray will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Mr. Murray is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning or advisory fees, but will be excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain

products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Murray.

Item 5 – Additional Compensation

Mr. Murray has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Murray serves as a Senior Vice President and Financial Advisor for BHWA and is supervised by Ryan Hendrickson, the Chief Compliance Officer. Mr. Hendrickson can be reached at (978) 767-8667.

BHWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of BHWA. Further, BHWA is subject to regulatory oversight by various agencies. These agencies require registration by BHWA and certain of its Supervised Persons. As a registered entity, BHWA is subject to examinations by regulators, which may be announced or unannounced. BHWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Steven E. Levitsky
Financial Advisor**

Effective: January 13, 2017

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Steven E. Levitsky (CRD# **4286743**) in addition to the information contained in the Boston Harbor Wealth Advisors, LLC (“BHWA” or the “Advisor”) (CRD # 282486) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the BHWA Disclosure Brochure or this Brochure Supplement, please contact us at (978) 767-8667.

Additional information about Mr. Levitsky is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Steven E. Levitsky, born in 1947, serves as a Financial Advisor of BHWA. Mr. Levitsky earned a Bachelors of Science in Psychology from Temple University in 1969. Mr. Levitsky earned a Masters in Education from Temple University in 1971. Mr. Levitsky earned a Masters in Business Administration Hospital Administration from Temple University in 1973. Additional information regarding Mr. Levitsky's employment history is included below.

Employment History:

Financial Advisor, Boston Harbor Wealth Advisors, LLC	01/2016 to Present
Financial Advisor, Raymond James Financial Services Advisors, Inc. and Raymond James Financial Services, Inc. (d/b/a Boston Harbor Wealth Advisors)	09/2015 to Present
Financial Advisor, Edward Jones Investments	12/2000 to 09/2015

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Levitsky. Mr. Levitsky has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Levitsky.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Levitsky.***

However, we do encourage you to independently view the background of Mr. Levitsky on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his name or by his Individual CRD# **4286743**.

Item 4 – Other Business Activities

Affiliation With Raymond James

Mr. Levitsky is also an investment advisor representative ("IAR") of Raymond James Financial Services Advisors, Inc. ("RJFSA"), a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Mr. Levitsky is also a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA, SIPC.

In his separate capacities as an IAR of RJFSA, Mr. Levitsky will receive advisory fees for Clients whose accounts and relationships are serviced under RJFSA. Mr. Levitsky will not receive ongoing investment advisory fees under BHWA fees for these accounts where a commission is earned.

Insurance Agency Affiliations

Mr. Levitsky is also a licensed insurance professional. Implementations of insurance recommendation are separate and apart from Mr. Levitsky's role with BHWA. As an insurance professional, Mr. Levitsky will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Mr. Levitsky is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning or advisory fees, but will be excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Levitsky.

Item 5 – Additional Compensation

Mr. Levitsky has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Levitsky serves as a Financial Advisor of BHWA and is supervised by Ryan Hendrickson, the Chief Compliance Officer. Mr. Hendrickson can be reached at (978) 767-8667.

BHWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of BHWA. Further, BHWA is subject to regulatory oversight by various agencies. These agencies require registration by BHWA and certain of its Supervised Persons. As a registered entity, BHWA is subject to examinations by regulators, which may be announced or unannounced. BHWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Jeffrey D. Omansky, CFP®
Financial Advisor**

Effective: January 13, 2017

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Jeffrey D. Omansky (CRD# **1057238**) in addition to the information contained in the Boston Harbor Wealth Advisors, LLC (“BHWA” or the “Advisor”) (CRD # 282486) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the BHWA Disclosure Brochure or this Brochure Supplement, please contact us at (978) 767-8667.

Additional information about Mr. Omansky is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Jeffrey D. Omansky, born in 1947, serves as a Financial Advisor of BHWA. Mr. Omansky earned a Bachelor of Arts in History, Government from the University of Hartford in 1969. Mr. Omansky earned a Bachelor of Science in Accounting from Bentley University in 1973. Additional information regarding Mr. Omansky's employment history is included below.

Employment History:

Financial Advisor, Boston Harbor Wealth Advisors, LLC	05/2016 to Present
Registered Representative, Raymond James Financial Services, Inc.	05/2016 to Present
Owner, Jeffrey D. Omansky Tax Consulting	02/1985 to Present
Financial Advisor, LPL Financial LLC	12/1986 to 05/2016
Tax Consultant, Lone Star San Vel	10/1979 to 02/1985

About the CFP® Designation

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Omansky. Mr. Omansky has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Omansky.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Omansky.***

However, we do encourage you to independently view the background of Mr. Omansky on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his name or by his Individual CRD# 1057238.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Omansky is also a registered representative of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Omansky will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Omansky. Neither the Advisor nor Mr. Omansky will earn investment advisory fees in connection with any services implemented in Mr. Omansky's separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by BHWA to its Clients are implemented by Mr. Omansky in his role as an Financial Advisor, not in his role as a Registered Representative. As such, Clients of BHWA will only pay advisory fees as described above. In no circumstances will BHWA earn an advisory fee and a commission on the same investment. In the event that Mr. Omansky earns a commission on an investment, the advisory fee will be waived by BHWA.

Insurance Agency Affiliations

Mr. Omansky is also a licensed insurance professional. Implementations of insurance recommendation are separate and apart from Mr. Omansky's role with BHWA. As an insurance professional, Mr. Omansky will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Mr. Omansky is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning or advisory fees, but will be excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Omansky.

In addition to Mr. Omansky's broker-dealer and insurance affiliations, Mr. Omansky also is the owner of Jeffrey D. Omansky Tax Consulting. Clients are under no obligation to use Mr. Omansky for tax preparation services.

Item 5 – Additional Compensation

Mr. Omansky has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Omansky serves as the Financial Advisor of BHWA and is supervised by Ryan Hendrickson, the Chief Compliance Officer. Mr. Hendrickson can be reached at (978) 767-8667.

BHWA has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of BHWA. Further, BHWA is subject to regulatory oversight by various agencies. These agencies require registration by BHWA and its employees. As a registered entity, BHWA is subject to examinations by regulators, which may be announced or unannounced. BHWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Benjamin P. Dodge
Financial Advisor**

Effective: January 13, 2017

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Benjamin P. Dodge (CRD# 6078204) in addition to the information contained in the Boston Harbor Wealth Advisors, LLC ("BHWA" or the "Advisor", CRD# 282486) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the BHWA Disclosure Brochure or this Brochure Supplement, please contact us at (978) 767-8667.

Additional information about Mr. Dodge is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6078204.

Item 2 – Educational Background and Business Experience

Benjamin P. Dodge, born in 1979, is dedicated to advising Clients of BHWA as a Financial Advisor. Mr. Dodge earned a Bachelor of Arts in Geography from the University of Vermont in 2004. Additional information regarding Mr. Dodge's employment history is included below.

Employment History:

Financial Advisor, Boston Harbor Wealth Advisors, LLC	09/2016 to Present
Financial Advisor, Raymond James Financial Services Advisors, Inc. and Raymond James Financial Services, Inc.	09/2016 to Present
Financial Advisor, Ameriprise Financial	06/2012 to 09/2016
Sales Manager, Meyer Jabara	12/2010 to 05/2012
General Manager, Chan Chich Lodge	08/2006 to 08/2010

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Dodge. Mr. Dodge has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Dodge.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Dodge.***

However, we do encourage you to independently view the background of Mr. Dodge on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6078204.

Item 4 – Other Business Activities

Affiliation With Raymond James

Mr. Dodge is also an investment advisor representative ("IAR") of Raymond James Financial Services Advisors, Inc. ("RJFSA"), a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Mr. Dodge is also a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA, SIPC.

In his separate capacities as an IAR of RJFSA, Mr. Dodge will receive advisory fees for Clients whose accounts and relationships are serviced under RJFSA. Mr. Dodge will not receive ongoing investment advisory fees under BHWA fees for these accounts where a commission is earned.

Insurance Agency Affiliations

Mr. Dodge is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart Mr. Dodge's role with BHWA. As an insurance professional, Mr. Dodge may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Dodge is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Dodge or the Advisor.

Item 5 – Additional Compensation

Mr. Dodge has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Dodge serves as a Financial Advisor of BHWA and is supervised by Ryan Hendrickson, the Chief Compliance Officer. Mr. Hendrickson can be reached at (978) 767-8667.

BHWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of BHWA. Further, BHWA is subject to regulatory oversight by various agencies. These agencies require registration by BHWA and its Supervised Persons. As a registered entity, BHWA is subject to examinations by regulators, which may be announced or unannounced. BHWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Johnathan C. Breen
Financial Advisor**

Effective: January 13, 2017

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Johnathan C. Breen (CRD# 6314805) in addition to the information contained in the Boston Harbor Wealth Advisors, LLC (“BHWA” or the “Advisor”, CRD# 282486) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the BHWA Disclosure Brochure or this Brochure Supplement, please contact us at (978) 767-8667.

Additional information about Mr. Breen is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6314805.

Item 2 – Educational Background and Business Experience

Johnathan C. Breen, born in 1984, is dedicated to advising Clients of BHWA as a Financial Advisor. Mr. Breen earned a Juris Doctor from Syracuse University in 2010. Mr. Breen also earned a Bachelor of Science in Business Administration from Sacred Heart University in 2007. Additional information regarding Mr. Breen's employment history is included below.

Employment History:

Financial Advisor, Boston Harbor Wealth Advisors, LLC	09/2016 to Present
Financial Advisor, Raymond James Financial Services Advisors, Inc. and Raymond James Financial Services, Inc.	09/2016 to Present
Owner, Law Office of Johnathan C. Breen	10/2016 to Present
Financial Advisor, Ameriprise Financial	04/2014 to 09/2016
Assistant Coach, Emerson College	10/2013 to 04/2014
Head Coach, Smash Volleyball	08/2013 to 04/2014
General Counsel, The Mortgage Specialists	11/2013 to 01/2014
Associate Attorney, The Law Office of Patrick Shanley	06/2011 to 08/2013
Associate Attorney, Burnham & Associates	11/2010 to 06/2011
Associate Attorney, Bernson & Burnham	08/2007 to 11/2010

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Breen. Mr. Breen has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Breen.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Breen.***

However, we do encourage you to independently view the background of Mr. Breen on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6314805.

Item 4 – Other Business Activities

Affiliation With Raymond James

Mr. Breen is also an investment advisor representative ("IAR") of Raymond James Financial Services Advisors, Inc. ("RJFSA"), a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Mr. Breen is also a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA, SIPC.

In his separate capacities as an IAR of RJFSA, Mr. Breen will receive advisory fees for Clients whose accounts and relationships are serviced under RJFSA. Mr. Breen will not receive ongoing investment advisory fees under BHWA fees for these accounts where a commission is earned.

Insurance Agency Affiliations

Mr. Breen is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart Mr. Breen's role with BHWA. As an insurance professional, Mr. Breen may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Breen is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain

products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Breen or the Advisor.

Licensed Attorney

Mr. Breen is also a licensed attorney with the Commonwealth of Massachusetts.

Item 5 – Additional Compensation

Mr. Breen has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Breen serves as a Financial Advisor of BHWA and is supervised by Ryan Hendrickson, the Chief Compliance Officer. Mr. Hendrickson can be reached at (978) 767-8667.

BHWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of BHWA. Further, BHWA is subject to regulatory oversight by various agencies. These agencies require registration by BHWA and its Supervised Persons. As a registered entity, BHWA is subject to examinations by regulators, which may be announced or unannounced. BHWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Mitchell D. Custenborder
Financial Advisor**

Effective: January 13, 2017

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Mitchell D. Custenborder (CRD# 5192701) in addition to the information contained in the Boston Harbor Wealth Advisors, LLC ("BHWA" or the "Advisor", CRD# 282486) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the BHWA Disclosure Brochure or this Brochure Supplement, please contact us at (978) 767-8667.

Additional information about Mr. Custenborder is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5192701.

Item 2 – Educational Background and Business Experience

Mitchell D. Custenborder, born in 1986, is dedicated to advising Clients of BHWA as a Financial Advisor. Mr. Custenborder earned a B.S. in Business Management from University of Dayton in 2009. Additional information regarding Mr. Custenborder's employment history is included below.

Employment History:

Financial Advisor, Boston Harbor Wealth Advisors, LLC	01/2017 to Present
Financial Advisor and Registered Representative, Raymond James Financial Services Advisors, Inc. and Raymond James Financial Services, Inc.	01/2017 to Present
Financial Advisor, Edward Jones	09/2013 to 12/2016
Golf Professional, Cohasset Golf Club	04/2010 to 09/2013

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Custenborder. Mr. Custenborder has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Custenborder.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Custenborder.***

However, we do encourage you to independently view the background of Mr. Custenborder on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5192701.

Item 4 – Other Business Activities

Affiliation With Raymond James

Mr. Custenborder is also an investment advisor representative ("IAR") of Raymond James Financial Services Advisors, Inc. ("RJFSA"), a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Mr. Custenborder is also a registered representative ("RR") of Raymond James Financial Services, Inc. ("RJFS"), a registered broker-dealer, member FINRA, SIPC.

In his separate capacities as an IAR of RJFSA, Mr. Custenborder will receive advisory fees for Clients whose accounts and relationships are serviced under RJFSA. Mr. Custenborder will not receive ongoing investment advisory fees under BHWA fees for these accounts where a commission is earned.

Insurance Agency Affiliations

Mr. Custenborder is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart Mr. Custenborder's role with BHWA. As an insurance professional, Mr. Custenborder may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Custenborder is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Custenborder or the Advisor.

Item 5 – Additional Compensation

Mr. Custenborder has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Custenborder serves as a Financial Advisor of BHWA and is supervised by Ryan Hendrickson, the Chief Compliance Officer. Ryan Hendrickson can be reached at (978) 767-8667.

BHWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of BHWA. Further, BHWA is subject to regulatory oversight by various agencies. These agencies require registration by BHWA and its Supervised Persons. As a registered entity, BHWA is subject to examinations by regulators, which may be announced or unannounced. BHWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective Date: January 13, 2017

Our Commitment to You

Boston Harbor Wealth Advisors, LLC ("BHWA" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. BHWA (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

BHWA does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes BHWA does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where BHWA or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients BHWA does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (978) 767-8667.