

Item 1: Cover Page

**Part 2A Appendix 1 - Form ADV
Wrap Fee Program Brochure
March 23, 2020**



Personal CFO Solutions

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This brochure provides information about the qualifications and business practices of Personal CFO Solutions, LLC. If you have any questions about the contents of this brochure, please contact us at (908) 955-7055. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Personal CFO Solutions, LLC is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Personal CFO Solutions, LLC is 158248.

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

Item 2: Material Changes

This amendment to the Personal CFO Solutions Wrap Fee Program Brochure is dated March 23, 2020 and replaces the previous brochure, which was filed on March 15, 2019. Items 4, 6 and 7 of this Brochure have been revised or updated to reflect the following material changes:

- Amendments were made to the portfolios offered to clients (Item 4)
- Fees for PCFO Managed Portfolio were updated (Item4)
- Consulting Services related to 401K plans were more fully described (Item #6)
- Amendments to Risk of Loss were made to summarize the risks into an overall risk profile (Item #6)
- Description of the Client Information provided to Portfolio Managers was amended to more fully describe this practice (Item #7)

As of December 31, 2019, Personal CFO had \$890,591,819 assets undermanagement.

Item 3: Table of Contents

Item 1: Cover Page.....	1
Item 2: Material Changes.....	2
Item 3: Table of Contents	3
Item 4: Services, Fees and Compensation	4
Item 5: Account Requirements and Types of Clients	4
Item 6: Portfolio Manager Selection and Evaluation.....	4
Item 7: Client Information Provided to Portfolio Managers.....	7
Item 8: Client Contact with Portfolio Managers	7
Item 9: Additional Information	7

Item 4: Services, Fees and Compensation

Personal CFO Solutions, LLC, (“Personal CFO”, “firm”, “we”, “us” or “our”) is the sponsor and manager of a wrap fee account program (“Personal CFO Managed Portfolios” or “the Program”). Personal CFO Managed Portfolios are managed on a discretionary basis by Personal CFO. The Personal CFO Managed Portfolios are designed by Personal CFO to meet several allocation and client objectives. Personal CFO Managed Portfolios currently include the following portfolios: Hedged, Conservative, Moderate, Growth, Aggressive Growth, All Equity, and Sector Rotation. Personal CFO also offers the following ETF only equity portfolios: Buffered Equity, 50/50 Domestic/International equity and 75/25 Domestic/International equity.

Personal CFO Managed Portfolios consists of investment company securities such as mutual fund shares and exchange traded funds (ETFs). Although Personal CFO does not recommend individual equities, a Client may choose to maintain some percentage of equity securities (such as exchange-listed and securities traded over-the-counter).

The annual fee for Personal CFO Managed Portfolios will be charged as a percentage of assets under management, which is negotiable and is equal to 0.5%, .75%, or 1% of assets in the portfolio. This fee will vary depending on other Personal CFO Services purchased by the client and the type of client relationship. This wrap fee includes our management fee and the transactions costs for the purchase and sale of securities charged by the qualified custodian. Clients will pay additional fees that are not included in the wrap fee. The wrap fee does not include the fees associated with the underlying mutual funds and ETFs. Mutual fund and ETF fees and expenses are described in each fund’s prospectus, and will generally include a management fee, other fund expenses, and a possible distribution fee.

The fees are negotiable at Personal CFO’s sole discretion. The total fee is paid to Personal CFO as the investment adviser of the portfolio and sponsor of the wrap fee program. From this fee Personal CFO pays brokerage fees to the custodian.

Wrap fee programs may cost the client more or less than purchasing such services separately. The cost of these services separately would depend on the portfolio's management fee, the frequency of trading in the portfolio, commission rates charged, and other associated fees. Any fees charged to an account will lower the performance returns. Other advisers could provide the same or similar services while charging a lower effective fee rate.

Personal CFO receives a fee for the management of the Personal CFO Managed Portfolios. Therefore, we have an incentive to recommend the Program. The amount of this compensation will be more that what Personal CFO would have received if the client paid for the funds in Personal CFO Managed Portfolios separately. Personal CFO seeks to address these potential conflicts relating to management of the wrap account by disclosing this to clients so that they can consider the potential conflict.

Item 5: Account Requirements and Types of Clients

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

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

Item 6: Portfolio Manager Selection and Evaluation

Personal CFO acts as the sole portfolio manager and sponsor to our wrap fee program described in this Wrap Fee Program Brochure. The investment management team of Personal CFO is responsible for the oversight of the Personal CFO Managed Portfolios program. There are no other or outside portfolio managers

selected for our program. The portfolios are reviewed internally by the investment management team to review performance. Personal CFO's operational infrastructure and internal controls are well understood and are currently in place for other strategies offered to clients. As a result, the review process focuses on the specifics of the investment strategy and any unique characteristics, risks of the investment strategy and communication with the clients.

Personal CFO receives a fee for the management of the Personal CFO Managed Portfolios. Therefore, we have an incentive to recommend the Program. The amount of this compensation will be more than what Personal CFO would have received if the client paid for the funds in Personal CFO Managed Portfolios separately. Personal CFO seeks to address these potential conflicts relating to management of the wrap account by disclosing this to clients so that they can consider the potential conflict.

The Firm's Services

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

1. Financial Planning and Consulting

Personal CFO specializes in financial planning and consulting services. These services are comprised of ongoing financial counseling services for clients which incorporate the following areas: investment planning; income tax planning and preparation; estate planning & wealth transfer planning; employee benefit elections; insurance reviews and recommendations; financing of purchases; and cash flow modeling including retirement planning. We also provide various services relative to client assets not under Personal CFO's management, including reviewing and monitoring such assets, and various activities related to such services.

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

Typically, Personal CFO will assist the client with the implementation of the financial plan while working with the client's attorney, accountant, and/or insurance agent. The implementation of this plan will generally take the form of the Portfolio Management services described below. Personal CFO will also recommend the services of other professionals, such as tax, legal and mortgage professionals. Personal CFO does not receive any compensation for such referrals. The client is under no obligation to engage the services of any such recommended professional and retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Personal CFO.

2. Discretionary Portfolio Management Services

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

Using the determined client profile, if suitable to the client's investor profile, the Firm will recommend the Personal CFO Managed Portfolios program described in Item 4. The Personal CFO Managed Portfolios allocates client investable assets among various investment company securities (such as mutual funds and ETFs).

In addition to the above Program, if suitable to the client's investor profile, Personal CFO recommends that its clients allocate investment assets on a discretionary basis to independent investment manager programs

offered through one or more independent managers (the “Independent Manager”). In the event that an Independent Manager is utilized, the client will be required to execute a separate written agreement with the Independent Manager (“Independent Manager Advisory Agreement”) and will incur additional fees imposed directly by the Independent Manager.

Additionally, Financial Planning clients who have elected to not utilize the Program or an Independent Manager, as part of the ongoing financial planning services, will allow Personal CFO to recommend and effect transactions on their behalf in their accounts on discretionary basis. These clients are responsible for all brokerage fees.

3. 401k Consulting

The firm also occasionally acts as a 401k consultant for various 401k plans on a non-discretionary basis. In providing 401k consulting services, the firm assists the client in determining risk tolerance and investment objectives that are appropriate for each plan. This service is offered ancillary to the Firm’s discretionary portfolio management service, and Personal CFO does not receive additional compensation beyond that charged for its Personal CFO Managed Portfolios.

Tailored Services

In connection with the provision of Personal CFO’s services, Personal CFO tailors its advisory services to the client’s individual needs. It does this by completing a client suitability assessment for each client, and by maintain regular contact between Personal CFO and the client to ensure that the client’s goals and risk tolerance are current. Clients can impose reasonable restrictions on Personal CFO’s services, which can include restrictions on investing in certain securities or types of securities.

Wrap Fee Accounts

Personal CFO is the sponsor and manager of the Personal CFO Managed Portfolios Wrap Fee Program. Wrap fee accounts and allocation decisions are managed primarily based upon input from the investment management team. Other accounts are managed primarily by the Financial Advisor responsible for that client.

Performance-Based Fees and Side-By-Side Management

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

Methods of Analysis

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

Investment Strategy

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

Risk of Loss

All investments, including government debt, involve risk. Personal CFO does not guarantee the results of any of its advice or account management. Significant losses can occur from investing in securities, or by following any investment strategy, including those recommended or applied by Personal CFO. The financial markets may change, sometimes rapidly and unpredictably, and Clients (or Personal CFO acting on behalf of Clients) may not have the ability to avoid or prevent losses.

Clients participating in Personal CFO Managed Portfolios should also be aware that their individual account results may not exactly match the performance of the Model Portfolios. Such variance is due to a number of factors including without limitation differences in trade prices, transaction fees, market activity, any restrictions they have imposed on their accounts, and the amount, and the timing of, deposits or withdrawals a Client makes to an account.

Voting Client Securities

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

Item 7: Client Information Provided to Portfolio Managers

All new clients are required to complete a Morningstar Risk Tolerance Questionnaire. Client responses are then utilized by Personal CFO to create a Risk Tolerance Report. Client's are asked to review and update the questionnaire every two years to make sure that their investments are in line with their Risk appetite. Additionally, risk is discussed on an ongoing basis by the client's Financial Advisor utilizing Morningstar's Account Aggregate Exhibit. See Review of Accounts in Item 9 for additional information.

Item 8: Client Contact with Portfolio Managers

Your contact for information and consultation regarding your Program Accounts is generally your Financial Advisor. In certain instances, your Financial Advisor may coordinate their response with Personal CFO.

Item 9: Additional Information

Disciplinary Information

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

Other Financial Industry Activities and Affiliations

John Vieira as a registered representative of Purshe Kaplan Sterling Investments may be entitled to receive compensation from the sale of variable insurance products. In addition, John Vieira, Bryan Landadio, Patrick Nolan, Benjamin Ostrove, Michael Kirkland, Maryanne Mitchell and Kristin Sanguino are licensed insurance agents, in which capacities each of them may receive compensation from the sale of insurance products.

The activities of Mr. Vieira, Mr. Landadio, Mr. Nolan, Mr. Ostrove, Mr. Kirkland, Ms. Mitchell and Ms. Sanguino as insurance product agents and Mr. Vieira's activities as a registered representative represent a conflict of interest. They each have an incentive to recommend to a client that the client purchase insurance products (and in the case of Mr. Vieira, variable insurance products) based on their ability to receive compensation from any such purchases, rather than based on a clients' needs. In an effort to address this conflict, it is Firm policy that any such transactions are on terms that are acceptable for the industry and that those transactions must be in the best interest of the client. No client is required to purchase such products through any of the Firm's associated persons, and each client has the option to purchase those products through other brokers or agents that are not affiliated with the Firm.

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

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

Independent Managers

As Personal CFO recommends that its clients allocate investment assets on a discretionary basis to independent investment manager programs offered through one or more independent managers (the "Independent Manager"). In the event that an Independent Manager is utilized, the client will be required to execute a separate written agreement with the Independent Manager and will incur additional fees imposed directly by the Independent Manager. These agreements will entitle to Personal CFO to additional fees that it otherwise would not receive, thus advisors have an incentive to recommend Independent Managers. Clients are strongly encouraged to review the Independent Manager Advisory Agreement and the additional fees that they will be charged. For each investment style we sort the thousands of managers offered by Envestnet and on Morningstar by Alpha and Sharpe ratios and Performance. Once we have sorted these managers, we review up capture/down capture to ensure they qualify for further review. After we have prepared these screens we take the top twenty managers and begin a significantly deeper dive. We review the management style, length of tenure of the management team, consistency of the returns, the fees, the types of stocks/bonds they purchase as well as many other MPT statistics. It is at this point we narrow the list to just a few managers. We then compare this list of managers to the current list of managers we currently use in that investment style. If the manager looks like it is a good candidate, it is then brought to our investment committee. Our investment committee reviews the manager up for consideration and a vote is held. If the manager is approved, then it is added to the current list of managers we use. We use the same process to remove managers.

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

1. Code of Ethics

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

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

termination of employment.

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

2. Participation or Interest in Client Transactions

Personal CFO does not recommend any securities in which it, or a related person, has a material financial interest.

3. The Purchase or Sale of the Same Securities as for the Client

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

4. The Purchase or Sale of Same Securities at or About the Same Time as in a Client's Account

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

Review of Accounts

Personal CFO's client accounts are reviewed primarily by the Financial Advisor responsible for that client relationship. Oversight is provided by the three Managing Director's: John Vieira, Bryan Landadio, and Patrick Nolan.

Client accounts/financial plans are reviewed on an ongoing process by the Financial Advisor. Whenever significant economic events, changes in market conditions, or important new developments arise concerning a security's effect on the client's account. Additionally, Clients are strongly encouraged to contact their Financial Advisor whenever they have a change in life circumstances, goals, risk tolerance, or any other event that may affect their investment needs. Financial Advisors will, every two years, contact ongoing investment advisory clients to review their accounts and update the Morningstar Risk Tolerance Questionnaire.

Clients receive written reports and confirmations of all transactions directly from the broker-dealer or custodian for the client accounts. Clients are urged to compare custodial statement with Personal CFO reports and rely solely upon the reports issued by the broker-dealer/custodian of the assets. Personal CFO also can provide reports to clients that include such relevant account and/or market-related information such as Net Worth Statements, Asset Details, Asset Allocations, Account Cash Flow Summaries, and Performance Summaries. Account Aggregate and X-Ray Reports from Morningstar can also be provided at the Financial Advisor's discretion. Any such reports are provided as an accommodation only.

Client Referrals and Other Compensation

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

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

Financial Information

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