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This brochure provides information about the qualifications and business practices of the Boston Family Office LLC (BFO). If you have a question about the contents of this brochure, please contact us at (617) 624-0800. The information in this brochure follows the outline determined by the Securities and Exchange Commission for Form ADV Part 2 but has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about the Boston Family Office is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The Boston Family Office is a registered investment adviser, registered with the Securities and Exchange Commission. Although we are a registered investment adviser, there is neither specific training required nor are there tests or proof of skill needed in order to become a registered investment adviser.

**Material Changes:** Since our last annual update on March 29, 2021, The Boston Family Office LLC ("BFO" or "the "Firm") has experienced the following changes:

On June 30, 2021, Megan Siegal, the BFO Chief Compliance Officer, retired from the Firm. Ms. Siegal will remain an equity member of the Firm through the end of the calendar year. Darren Beals assumed the role of Chief Compliance Officer upon Ms. Siegal's retirement.

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#### **Item 4 – Advisory Business**

**A.** The Boston Family Office LLC (BFO) was founded in 1996. It is privately held and is a limited liability company. The firm has 15 partners, eight of whom are active managing directors of the business. Of those eight, seven work full time at the BFO, while George Putnam, III has other business interests and is not involved in daily operations. The other seven partners are each generation-skipping trusts created by the estate of a deceased former partner, and none of those trusts has an interest greater than 3%. One partner, George Putnam, III, has a 30% interest in the firm, and no other partner has more than a 25% interest in the firm.

**B.** The BFO provides personalized investment advisory services primarily to individuals, family groups, trusts, and charitable organizations. In certain circumstances, the BFO will advise estates and pension plans. Our clients are predominantly taxable entities, and tax consequences are included as part of the investment decision. Each account is individually managed, with investments primarily in liquid securities, including common stocks, government, corporate and municipal bonds, mutual funds, and exchange-traded funds. For qualified individuals, we will explore investments in limited partnerships and private investment pools.

**C.** The BFO advises clients based on their individual needs. All accounts are individually managed with consideration of the client's current and future income needs, tolerance for taxes, and the ultimate disposition of the assets. In general, at the start of a relationship we determine the asset allocation to meet the risk and income requirements of the client and then manage the account accordingly. Periodically, we meet with the client to make sure that the initial parameters still hold and adjust them as necessary. If a client imposes a restriction on investing in certain securities, we will abide by it or suggest that the client seek another investment adviser if we feel that we are unable to work within the restrictions.

**D.** The BFO does not participate in wrap fee programs.

**E.** At December 31, 2020, the BFO had total assets under management of \$1,653 million. \$1,557 million is managed on a discretionary basis and \$96 million is managed on a non-discretionary basis or is unsupervised.

#### **Item 5 – Fees and Compensation**

**A.** Fees are calculated as a percentage of assets under management based on the market value of the portfolio at the end of the quarter and paid in arrears according to the following schedule:

<b>Portfolio Size</b>	<b>Annual Rate on Total Portfolio</b>
>\$1,000,000-2,000,000	95 basis points (0.95%)
>\$2,000,000-5,000,000	80 basis points (0.80%)
>\$5,000,000-10,000,000	65 basis points (0.65%)
>\$10,000,000	50 basis points (0.50%)

In particular circumstances, fees may be negotiable. In addition, from time to time, we are called upon to advise on matters for which an assets-under-management based fee is not applicable (for example, settlement of estates or portfolio review of accounts not held at the BFO), and, in these cases, we charge an hourly rate or a fixed fee.

**B.** Fees are calculated and due quarterly in arrears. For accounts that use BNY Mellon or our institutional relationship at Fidelity for custody, our fee is customarily deducted automatically from the client's account, but these clients can choose to be billed instead. Clients who use other custodians are billed.

**C.** If the client's assets are held at BNY Mellon or Fidelity through our institutional relationship, there is no additional charge to the client for custody. If accounts use another bank or brokerage firm for custody, then the custody arrangement is between the client and the custodian and may involve fees. Clients should expect to pay the bank fees associated with wire transfers or other processing transactions. If accounts hold shares in mutual funds or exchange traded funds or interests in limited partnerships or private placements, the fees charged by those managers are incurred in addition to the BFO's fee. If a portion of a client's account is sub-advised by an outside manager, the client will bear the fees charged by that manager in addition to the BFO's fee. Clients will pay the brokerage fees associated with transactions in their accounts (please see Item 12 below).

**D.** Fees for a final, partial quarter will be prorated based on when the assets are transferred from the account and refunded if a fee had been paid in advance.

**E.** Neither the BFO nor any of its related persons receive compensation for the sale of securities or other investment products.

#### **Item 6 – Performance-Based Fees**

The BFO does not receive performance-based fees. Some clients hold investments managed by outside managers; some of those investments may be subject to a performance-based fee.

#### **Item 7 – Types of Clients**

The BFO provides investment advisory services primarily to individuals, family groups, trusts, and charitable organizations. In certain circumstances, the BFO will advise estates and pension plans.

The BFO advises clients based on their individual needs. All accounts are separately managed. In general, \$1.0 million in investable assets is required to open an account.

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

**A.** The BFO relies primarily on fundamental analysis in evaluating securities for investment. On a macro-economic basis, the BFO will consider trends in the US and world economies, demographics, consumer confidence, and other current and historical events. We look for reasonably priced growth companies that are benefiting from these favorable macro-economic trends, have strong product or service franchises, and good management teams. When making investments in fixed income, the creditworthiness of the issuer (usually investment grade), the number of years until maturity (rarely more than 12), and the coupon rate are the most important factors. In addition to managing portfolios, each portfolio manager at the BFO is responsible for following a sector of the economy. Primary sources as well as various research providers are used to generate new investment ideas and formal presentations on each sector are made to the Investment Committee several times a year.

Our general investment strategy is to build diversified portfolios of individual equities, and government, corporate, or municipal bonds depending upon prevailing interest rates and the client's tax situation. Other asset classes may be added as appropriate, possibly through mutual funds, exchange-traded funds, or alternative investments such as real estate partnerships, hedge funds, private equity, or venture capital. The client's tolerance for loss, growth expectations, and income needs will be used to determine the appropriate asset allocation. Portfolio managers independently determine the suitability of particular investments relative to each client's specific needs and existing assets, and then implement these ideas.

**B.** Security markets are volatile, and investing in them involves the risk of loss of value. The price of both equities and fixed income securities are influenced by a wide range of economic and geo-political events. While investing in securities over a long period has tended to be rewarding, there have been periods where significant loss was realized by those liquidating their portfolios.

**C.** Not applicable – the BFO does not primarily recommend a single type of security.

### **Item 9 – Disciplinary Action**

In 2017, the BFO determined that four of its investment adviser representatives had not been registered in Massachusetts, as required by Massachusetts regulations. Two of those representatives were retired prior to 2017. The BFO began the process of remedying this oversight and making the necessary filings with Massachusetts. All of the firm's investment adviser representatives are now registered with Massachusetts. As a result of the failure to register the four individuals in a timely manner, the Massachusetts Securities Division entered an administrative order against the BFO on 10/4/18, imposing

a \$55,000 fine. The BFO has implemented enhanced compliance procedures to make certain this issue does not occur again.

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

**A.** Not applicable – neither the BFO nor any of our management persons are registered as a broker-dealer or registered representative of a broker-dealer.

**B.** Not applicable – neither the BFO nor any of our management persons are registered as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

**C.** The BFO as a firm does not maintain any relationships or arrangements with other businesses or advisers that are material to our advisory business or to our clients. We do have BFO partners who, as individuals, are affiliated with products or services that we may occasionally recommend to clients. In these situations, we use the same criteria in evaluating these investments as we do other investments. In addition, the relationship and potential conflict of interest with these investments is fully disclosed to the client before any investment is made. The BFO does not receive compensation from these outside firms as a result of our client's investments. The relationships and affiliations of our related persons to investments that we occasionally recommend to clients are described below.

**2. *Investment company or other pooled investment vehicle:*** George Putnam, III is a Trustee of the Putnam Funds, a family of mutual funds, and George P. Beal is a Trustee of Northeast Investors Trust, a mutual fund. The compensation paid to Mr. Putnam and Mr. Beal by these firms is not influenced by our client's investments.

**3. *Other investment adviser or financial planner:*** George P. Beal serves on the advisory board of Breckinridge Capital Advisors, a registered investment adviser of fixed income portfolios. The compensation paid to Mr. Beal by Breckinridge Capital Advisors is not influenced by our client's investments.

**11. *Sponsor or syndicator of limited partnerships:*** George Putnam, III is President of New Generation Advisors, which is the general partner of New Generation, LP, an investment partnership. Mr. Putnam's primary business is New Generation Advisors and as such he does benefit from the incremental growth of assets in the partnership. However, as described in Item 4A and in the ADV Part 2 Supplement, Mr. Putnam is not involved in the daily operations of the BFO and does not participate in the process of recommending BFO clients to invest in New Generation.

**D.** For information on potential conflicts of interest in selecting other investment advisors for our clients, please refer to the discussion above in Item 10, Section C.

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

**A.** Our Code of Ethics requires all supervised persons of the Boston Family Office to put the client's interest above their own and that their actions shall at all times be governed by the following general principles:

- We are fiduciaries for our clients; as such, we have an affirmative duty of care, loyalty, honesty and good faith to act in the best interest of our clients;
- We must always place the interest of our clients ahead of our personal interests or the interests of the firm and must not favor one client over another;
- We must always act in a manner that avoids any conflict of interest, either real or perceived;
- All information pertaining to any client must be held strictly confidential;
- We must always strive to achieve and maintain independence and objectivity in making investment decisions; and
- We must always strive to achieve the highest standards of professionalism in all aspects of our business.

All supervised persons receive training on the Code of Ethics each year and agree to adhere to its requirements. We will provide a copy of our full Code of Ethics, which includes our Personal Trading Policy, Client Privacy Policy, and Written Information Security Program (WISP), to any client or prospective client upon request.

**B.** See Item 10, Section C above.

**C. & D.** From time to time, BFO persons may trade in their personal accounts the same securities that are being traded or held in client accounts; these transactions present a conflict of interest. To protect our clients' interests, we require all BFO managing directors, investment committee members, and/or employees with daily involvement in trade settlement (collectively referred to as "access persons") to comply with the restrictions imposed by our Personal Trading Policy.

The policy, incorporated into our Code of Ethics, reiterates that we must always put our clients' interests before our own and generally prohibits BFO persons from buying or selling a security on the same day that the same security is being bought or sold in a client account. Personal trades that have little chance of moving the market (for example, a small trade in a large-cap stock) are exempt from this same day trading ban; the guidelines for these exemptions are listed in detail in our policy. Prior approval from the Chief Compliance Officer is required for an access person to participate in a limited offering or an IPO.

Several of our BFO partners and their families have chosen to have their personal accounts managed by the BFO. They sign Investment Management Agreements like our other clients and the accounts are typically managed by another partner. Transactions in these BFO-managed personal accounts may be done on the same day as other clients only if they are executed alongside other client transactions in a combined trade order as to make sure that the BFO-managed personal account receives the same price as and no advantage over the other client participants. If a trade in a BFO-managed personal account is a stand-alone trade, then it is subject to the same restrictions and exemptions that govern transactions in personal accounts held outside of the BFO.

Personal transactions from BFO access persons are reported and reviewed quarterly to confirm compliance with the Personal Trading Policy. A lengthier discussion of our personal trading procedures is found in our Personal Trading Policy, which is incorporated into our Code of Ethics and available to any client or prospective client upon request.

## **Item 12 – Brokerage Practices**

**A.** The BFO chooses broker-dealers for their ability to achieve favorable execution of trades and secondarily for the quality of their proprietary research or third-party research or services that they may provide. Except for directed trades and accounts held at custodians where commissions generally cover the cost of custody, the same negotiated commission schedule is used with all our broker-dealers.

**A.1** As a result of client commissions, these broker-dealers may provide us with research and products that improve the quality of our investment process. This is of benefit to all of our clients.

**A.1.a.** The BFO does not need to maintain a dedicated in-house research team because of the research and products it receives in exchange for client commissions and thus has a lower overall cost and fee structure.

**A.1.b.** While the BFO may have an incentive to choose a broker-dealer for a particular client transaction based solely on the research and products it may provide us, the BFO always makes the choice first and foremost based on the broker's ability to execute the trade.

**A.1.c.** The BFO could obtain lower commission charges for its clients if paying for execution services only.

**A.1.d.** The BFO uses the research and products provided by broker-dealers to service all client accounts irrespective of which client accounts generated the associated commissions.

**A.1.e.** The research and products received by the BFO from broker-dealers in exchange for client commissions may include research on specific companies or industries, general



economic and security market reviews, programs providing current and historical stock quotations and company data, and access to meetings with company management and analysts. In no instance do we receive anything that does not aid in investment decision-making.

**A.1.f.** The BFO tracks its commission expenditures in an effort to ensure that broker-dealers are adequately compensated for the research and products they provide. With certain broker-dealers we have an explicit amount of commissions required to cover products or research they provide to us. With other broker-dealers who provide proprietary research, we set targets for the portion of commissions they will receive.

**A.2** Not applicable – the BFO does not receive client referrals from broker-dealers as incentive for using the broker-dealer to execute client transactions.

**A.3.a.** Not applicable – the BFO does not routinely recommend, request, or require clients to direct us to execute transactions through a specific broker-dealer or custodian.

**A.3.b.** When clients directs us to use a specific broker-dealer, we inform them that their commissions may be higher than the commissions we have negotiated with other broker-dealers, particularly in instances when we could otherwise aggregate their order with those of other clients, and that executions of trades may not be as favorable.

**B.** When possible, the BFO will aggregate the purchase or sale of a particular security for multiple client accounts. By aggregating, we can sometimes obtain a lower commission rate. We do not have a central trading desk so there are instances when aggregation possibilities are missed. When this happens, there is the chance that the commission is higher than it would have been had the trade been included with others.

### **Item 13 – Review of Accounts**

**A.** Each account at the Boston Family Office is overseen by a portfolio manager and reviewed by the Investment Committee semi-annually. The Investment Committee includes the following people: George Beal (Managing Partner), Dylan Brix, E. Greer Candler (Partner), Michael Dorsey Jr., Peder Johnson (Partner), Benjamin Richardson (Partner and Chief Investment Officer), Eliza (Happy) Rowe (Partner and Treasurer), Darren Beals (Chief Compliance Officer), and Michael Unger (Partner). At the review, the Committee is brought up to date on the client relationship and recent activity within the account(s) and then the Committee reviews the portfolio objectives, asset allocation, current holdings, and the account's(s) performance.

**B.** Not applicable – client accounts are reviewed on the semi-annual schedule described above, reviews are not triggered by other factors.

**C.** Not applicable – the BFO does not, as a firm, provide regular reports to clients. Client reports and updates are managed on an individual basis according to client and portfolio manager preferences. Account statements are sent to the client directly by the custodian.

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

**A.** Not applicable – the BFO does not receive economic benefits for our investment advice or advisory services from non-clients.

**B.** The BFO does not engage solicitors in order to acquire new client relationships. On two client relationships, we do pay a portion of our management fee to Christopher P. Jones who referred those clients to us more than fifteen years ago.

#### **Item 15 – Custody**

All of our client accounts are held with a qualified custodian. Clients receive account statements directly from the custodian at least quarterly and we urge clients to review those statements and compare them to any portfolio reports they may have received from the BFO. The reports and materials provided by the BFO to clients are generated by our internal accounting system and while they contain information obtained from the account's custodian or other reliable sources, the client statement from the custodian is the official record of the account.

The Boston Family Office has custody of client funds held in accounts at BNY Mellon and Fidelity (through our institutional relationship) and in a small number of other accounts where we use a login permissioned to transfer funds or where we serve as a trustee or power of attorney. We have custody in these situations because we can direct clients' funds. Like all of our client accounts, these accounts are held by a qualified custodian and receive statements directly from the custodian at least quarterly. In addition, an independent accountant performs a surprise audit on these custody accounts each year to verify their holdings.

#### **Item 16 – Investment Discretion**

The BFO has investment discretion for the vast majority of our accounts. This discretion is spelled out in the Investment Management Agreement that is signed by the client when the account is opened. Even when we have discretionary authority, certain custodians may require that the client provide the BFO or portfolio manager a trading power of attorney. This is done according to the custodian's parameters and is typically limited to no more than allowing us to effect transactions in the covered account(s) on the client's behalf.

#### **Item 17 – Voting Client Securities**

**A.** The BFO will not accept responsibility to vote proxies.

**B.** Under the terms of the BFO Investment Management Agreement, clients selecting BNY Mellon as their custodian may elect to vote their own proxies (in which case materials will be sent to them by BNY Mellon), or have Broadridge Financial Solutions

vote the proxies on the client's behalf. Clients who use a custodian other than BNY Mellon are responsible for voting their own proxies.

**Item 18 – Financial Information**

- A.** Not applicable – the BFO does not require or solicit prepayment of client fees.
- B.** The BFO neither has nor foresees a financial condition (insolvency or bankruptcy) that would impair our ability to meet contractual commitments to clients.
- C.** The BFO has never been the subject of a bankruptcy petition.