

**Part 2B of Form ADV: Brochure Supplement**

Eric E Turloff, CFA  
CRD 4476538  
Eagle Harbor Asset Management, Inc.  
701 Fifth Avenue #4200  
(206) 224-4101  
March 12, 2021

This brochure supplement provides information about Eric E. Turloff, CFA that supplements the Eagle Harbor Asset Management, Inc brochure. You should have received a copy of that brochure. Please contact Andrew P. Loechl, CFA if you did not receive Eagle Harbor Asset Management, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Eric E. Turloff is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2 Educational Background and Business Experience**

Eric E. Turloff, CFA\*

Born March 29, 1958

\* The CFA designation is a professional certification awarded to candidates by the CFA Institute (formerly AIMR). Candidates must complete three levels each culminating in a six hour exam, have four years of qualified investment experience, and are obligated to adhere to the CFA Institute's Code of Ethics and Standards of Professional Conduct.

### **EDUCATION**

University of Michigan BBA 1978

### **BUSINESS BACKGROUND**

February 2011 to Present  
Eagle Harbor Asset Management, Inc.  
Back-up Portfolio Manager

1998 to Present  
Turloff Financial Consulting  
Owner

1980 to 1998  
Weyerhaeuser  
Financial Analyst

1978 to 1980  
Ernst & Whitney  
Senior Auditor

### **PROFESSIONAL ASSOCIATIONS**

Chartered Financial Analyst [CFA]; Member, CFA Institute 2000  
Member, CFA Society of Seattle, October 2000 – Present  
Certified Public Accountant [CPA]; 1980

### Item 3 Disciplinary Information

Eric E. Turloff has had no legal or disciplinary history or events as described in A, B, C, and D below.

A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the *supervised person* 1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any *felony*; (b) a *misdemeanor* that *involved* investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; 2. is the named subject of a pending criminal *proceeding* that involves an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; 3. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or 4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the *supervised person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*.

B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which the *supervised person* 1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or 2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority (a) denying, suspending, or revoking the authorization of the *supervised person* to act in an *investment-related* business; (b) barring or suspending the *supervised person's* association with an *investment-related* business; (c) otherwise significantly limiting the *supervised person's investment-related* activities; or (d) imposing a civil money penalty of more than \$2,500 on the *supervised person*.

C. A *self-regulatory organization (SRO) proceeding* in which the *supervised person* 1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or 2. was *found* to have been *involved* in a violation of the *SRO's* rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than \$2,500.

D. Any other *proceeding* in which a professional attainment, designation, or license of the *supervised person* was revoked or suspended because of a violation of rules relating to professional conduct. If the *supervised person* resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a *proceeding* (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

#### **Item 4 Other Business Activities**

A. Investment Related Business

Owner of Turloff Financial Consulting Registered Investment Adviser

B. Any Other Business or Occupation

Tax Preparation – approximately 2% of Eric Turloff's time is spent on tax preparation and not during trading hours. The service is available as a convenience to clients, but clients are encouraged to seek tax work elsewhere due to the inherent conflict of interest.

#### **Item 5 Additional Compensation**

Eric E. Turloff is the owner and sole proprietor of Turloff Financial Consulting and earns 100% of the fees from Turloff Financial Consulting.

#### **Item 6 Supervision**

Eric E. Turloff is supervised by the Chief Compliance Officer, Dr. Ufuk Ince. Eric E. Turloff is required to follow and abide by the compliance and policy procedures of Eagle Harbor Asset Management, Inc. as stipulated by law and the Washington State Department of Financial Institutions.

#### **Item 7 Arbitration and Other Claims**

A. In addition to the events listed in Item 3, Eric E. Turloff has **not** been *involved* in any of the following events listed below:

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

B. Eric E. Turloff has not been a subject in a bankruptcy petition