

# Marble Harbor Investment Counsel, LLC

## Form ADV, Part 3 – Client Relationship Summary (Form CRS)

June 26, 2020

### Item 1. Introduction

Marble Harbor Investment Counsel, LLC is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. The SEC offers free and simple tools to research firms and financial professionals at [www.Investor.gov/CRS](http://www.Investor.gov/CRS). This website also provides educational materials about investment advisers, broker-dealers, and investing.

### Item 2. Relationships and Services

#### *What investment services and advice can you provide me?*

We provide investment advisory services to clients through an investment management account. Our investment advice will be tailored to your unique needs, investment objectives, existing resources, goals, and risk tolerance. Based on our discussions with you we will develop a portfolio of investments that is individually managed and monitored on an ongoing basis. Our investment recommendations are not limited to a specific type of security. For example, we may invest in equities, fixed income, exchange-traded funds, mutual funds, municipal and U.S. government securities, and alternative investments, as appropriate. You can place reasonable investment restrictions on the management of your account. Your account will be held with a qualified custodian. We do not take custody or possession of your assets.

We will provide you with quarterly account appraisals and market commentary. We will contact you at least annually to review your portfolio and discuss your personal financial circumstances. The frequency of our communication with you will be based upon your needs. Our services are typically provided on a **discretionary** basis, which means we can buy or sell securities for your account without your prior consent. This authority remains in effect until you revoke it. In limited circumstances, we may provide investment advice on a **non-discretionary** basis, where we make investment recommendations to you and you decide whether or not to implement the recommendations. For additional information regarding our advisory services, please see Items, 4, 7, 13 and 16 in our Form ADV, Part 2A (“Brochure”) which is available in paper format upon request and on our website at [www.marbleharboric.com](http://www.marbleharboric.com).

#### *Questions to Ask Us:*

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualifications?*
- *What do these qualifications mean?*

### Item 3. Fees, Costs, Conflicts and Standards of Conduct

#### *What fees will I pay?*

Our Fees. Typically, we charge an annual *asset-based* fee. Our asset-based fee is calculated based on a percentage of the value of the cash and investments in your account on a quarterly basis that is payable each calendar quarter in arrears. The more assets in your account, the more you will pay in fees, and therefore, we have an incentive to encourage you to increase the assets in your account. Our standard annual fee schedule is tiered, with a maximum rate of 1.00% per year on the first \$5,000,000 of assets and with lower rates for assets over \$5,000,000. Please refer to our standard fee schedule in Item 5 of our [Brochure](#). At our discretion, our fees may be negotiated and may vary with respect to individual clients. We do not impose a minimum dollar value of assets on your account. However, we generally charge an annual minimum fee of \$10,000 per account. In limited circumstances, we may charge an annual flat fee for our investment advisory services.

Third-Party Fees and Costs. *In addition to our fee, you will incur management fees charged by mutual funds and exchange traded funds which are disclosed in a fund’s prospectus. You will also be responsible for additional fees and costs related to brokerage commissions, transaction fees, custodial fees, wire transfer fees, and other related costs and expenses from broker-dealers, custodians, and other third parties. We do not receive any portion of these commissions or fees.*



Additional Information. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information about our fees, please see Item 5 in our [Brochure](#).

**Questions to Ask Us:**

- *Help me understand how these fees and costs might affect my investments.*
- *If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

*When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means.* As discussed above, our asset-based fee can create a conflict of interest as we have an incentive to encourage you to add assets to your account and to increase the value of your assets to increase our fees.

As a fiduciary, we must, always serve the best interests of our clients and may not place our own interests ahead of the interests of our clients. For additional information about our conflicts of interests, please see our [Brochure](#).

**Questions to Ask Us:**

- *How might your conflicts of interest affect me, and how will you address them?*

**How do your financial professionals make money?**

Our financial professionals are either paid (1) a salary and bonus or (2) compensated based on the amount of client assets they manage, and revenue generated from our management fees. In certain circumstances, we will share a percentage of our management fee with employees for their efforts in developing new client relationships. Compensation paid to these employees will be disclosed to you and this would not affect the management fee paid by you. We have an incentive to encourage you to add assets to your account and to recommend our advisory services to you.

**Item 4. Do you or your financial professionals have legal or disciplinary history?**

No, our firm and our financial professionals do not have any legal or disciplinary history. Please visit [www.Investor.gov/CRS](http://www.Investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

**Questions to Ask Us:**

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

**Item 5. Additional Information**

Please visit our website at [www.marbleharboric.com](http://www.marbleharboric.com) for more information about our services or call us at 617-956-6710 to request up-to-date information or a copy of the Client Relationship Summary. Additional information about our firm is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Questions to Ask Us:**

- *Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer?*
- *Who can I talk to if I have concerns about how this person is treating me?*

