

March 18, 2019

FORM ADV – Parts 2A & 2B

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This Brochure provides information about the qualifications and business practices of Family Office Advisors LLC (FOALLC). If you have any questions about the content of this Brochure, please contact us at 212.697.7800 or by email at info@FOALLC.com. 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 Family Office Advisors LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Family Office Advisors LLC is a Registered Investment Advisor; registration only indicates that the firm has met certain regulatory filing standards and does not imply a certain level of skill or training.

This Brochure includes required ADV Part 2B "Brochure Supplement" information regarding Charles Comer, CMT and Andrew D. Stone, Esq. They can be contacted as listed above on this page.

Additional information about Mr. Comer is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes Since Most Recent Brochure, Dated March 13, 2018 – There have been no material changes in operations or personnel during the past year.

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Advisory Business – Family Office Advisors LLC (“FOALLC,” or “the firm”) is a Registered Investment Advisor providing wealth management counsel to families, trusts and individuals of means. It functions as a multi-family office and has done so since March 2003. The firm is owned by Charles Comer, CMT and Andrew D. Stone Esq.

The wealth management counsel we provide clients is comprehensive and ranges across all aspects of their financial affairs and related matters. We perform an analysis of each client’s financial circumstances, their lifestyle, risk tolerance and investment preferences. We develop a long term investment strategy designed to achieve the client’s goals through risk assessment, asset allocation, tax planning, estate planning, etc.

Our business model is “open architecture,” meaning that we provide the overall financial planning and guidance and then collaborate with and oversee its implementation by other professionals; we outsource activities such as the day-to-day portfolio management, drafting of legal documents, insurance underwriting, etc.

We work closely with clients to understand their goals, their investment preferences and their resources so we can tailor our advice to their unique financial and lifestyle situation. Our open architecture permits open-ended investment possibilities. While we emphasize prudence we do not impose any restrictions on clients’ investment choices or limitations. We communicate with the portfolio manager(s) in the event that a client imposes restrictions on investing in certain types of investments or in specific securities to ensure that those client preferences are fully met.

We do not “manage” clients’ funds in the sense of making specific buy/sell decisions day-to-day; that role is outsourced to third-party portfolio managers. Our investment-related role is to provide overall planning, asset allocation and monitoring of the performance of the investment strategy and of the portfolio managers executing that strategy. The amount of time spent on investment-related activities as compared to non-investment-related activities varies among clients and can be more or less than 50% investment-related during any given time period and/or for any given client. Our non-investment-related advisory services are a function of the client’s needs. For example, we review insurance risk, including life, long-term care, property and casualty, etc. We examine and guide family estate and tax strategy. Business-owning clients ask us to advise on their business strategy; we apply our experience to give an independent perspective for such clients. We advise on real estate transactions. The foregoing is a partial listing of the firm’s non-investment related activities. (See also “Other Business Activities” section on page 10.)

No discretion is or will be exercised by FOALLC; clients are free to accept or reject any counsel offered. As fiduciaries, the Members of FOALLC are required by law to put our clients’ interests ahead of their own personal interests.

Fees and Compensation – We are a “fee-only” firm; we do not receive commissions or any other remuneration beyond the fee we charge our clients. Our fee for our family office services is one percent per annum of the first five million dollars of investable assets, with a minimum fee of \$15,000; our fee is

negotiated for amounts above five million dollars. Special projects are undertaken at negotiated/fixed rates. We bill our clients quarterly in advance, based on the value of the assets under advisement at the beginning of each fiscal quarter. Any unearned fee will be refunded pro-rata upon early termination of the relationship (see termination, below.) Clients may be subject to additional fees from any brokers, portfolio managers, custodians, mutual funds or other financial intermediaries they may choose to engage (see Brokerage Practices, below.)

Performance-Based Fees and Side-by-Side Management – FOALLC does not impose or accept any performance-based fees nor engage in Side-by-Side Management activities.

Types of Clients – We provide wealth management counsel to individuals, families and trusts. While we do not have a minimum amount of assets for our comprehensive family office services, we do have a minimum fee of \$15,000 per annum, which equates to an account with \$1,500,000 of investable assets. FOALLC also provides counsel to client businesses.

Methods of Analysis, Investment Strategies and Risk of Loss – In forming our investment advice we use a range of analytical techniques and tools. To determine our recommended investment strategies we employ economic, monetary, fundamental, quantitative, technical, cyclical and mean variance analyses, alongside others. Among the tools and metrics we consider in arriving at an asset allocation strategy are valuation and risk measures such as price-to-earnings and price-to-earnings-growth ratios, price-to-sales, earnings yield, dividend yield, book value, interest rates, tax rates, credit quality, yield curve analysis, and duration.

No matter what analytical techniques are employed, or how many of them, there are always risks that even the best researched expectations are not met. Material risks range from geo-political through changes in monetary or fiscal policies, inflation, economic recession, competition, bad management decisions and just bad luck. Investment in all vehicles, not only stocks and bonds, but alternative investments – even cash – all risk loss of income, principal or purchasing power. Thus, clients must be prepared to bear such losses. While we advocate prudence and a long-term horizon in investing, typically counseling diversified portfolios, well-balanced among stocks, bonds, alternative asset classes, and cash and equivalents to achieve our clients' goals and mitigate loss, we cannot ensure that losses will be avoided. Whatever strategy we develop, it is based on the client's resources, needs and goals.

Disciplinary Information – Neither the firm nor any of its Members have any disciplinary event history.

Other Financial Industry Activities and Affiliations – The firm has recently entered into a joint venture with Clemente Advisors LLC to create a new entity, CA Family Office LLC, focused on providing wealth management counsel to clients domiciled in Asia. Further, while FOALLC does not believe the outside activities of Charles Comer, Managing Member, have any material effect on the firm, his performance as the Managing Member of FOALLC, nor on any clients, in the interest of full disclosure the following is offered: Charles Comer is employed part time by and is registered with BTIG, LLC, a broker-dealer, where he provides consulting services. Mr. Comer is also an elected Trustee of the Incorporated Village of Baxter Estates, NY.

Andrew D. Stone practices law in the State of New York; otherwise he has no other affiliations.

Please see appendix for summary discussion of the educational and business backgrounds of Messrs. Comer and Stone and for a further discussion of the firm's business activities.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading – Following is FOALLC's Code of Ethics

Family Office Advisors LLC strives to preserve its highly ethical, unbiased culture. Toward that end, the firm shall provide this current Code of Ethics to each Member and Employee, all of whom in turn, shall:

Be objective and be free of, or fully disclose, possible conflicts of interest.

Provide recommendations and decisions on behalf of our clients solely in each client's best interest.

Deal fairly with clients and discharge professional responsibilities with due care.

Act with integrity, dignity, diligence, competence, and honesty, and maintain the highest standards of ethics and report promptly any breach of this Code of Ethics to the Chief Compliance Officer.

Explain the fee(s) FOALLC will charge clients and the related services we will provide. Make clear that we will not accept any payments other than from our clients.

Protect the confidentiality of all private information relating to or entrusted by our clients, to the fullest extent permitted by law.

Provide our clients all requested information. Our clients' inquiries shall be answered to the best of our abilities in a prompt, accurate and courteous fashion.

Comply fully with all statutory and regulatory requirements issued by federal, state and professional bodies, including those relating to "insider trading."

Not seek to obtain clients by advertising or solicitation in a manner that is false, misleading, deceptive or over-reaching.

Permit the regular review and required reporting of their personal securities holdings and transactions to verify that activity is not counter to our clients' best interests.

Obtain approval of FOALLC prior to personally investing in an initial public offering or private placement.

Maintain a comprehensive knowledge base through continuing education and training and membership in appropriate professional societies.

Conflicts of Interest – While FOALLC rarely makes specific security recommendations to clients and the firm does not hold any securities, it nonetheless has the policy that any beneficial interest in such a recommended security by a firm Member be disclosed to the client. In such case, it is unlikely that there would be a conflict of interest, but if any conflict is perceived or may exist, the firm policy is that it be disclosed to the client. Since virtually all client transactions are effected by an outsourced, independent portfolio manager it is possible that a FOALLC Member and a client could transact in the same security at, or close to, the same time. We see no conflict in such an instance.

Brokerage Practices – While FOALLC strongly recommends that clients engage a portfolio manager to implement the day-to-day management of their investment portfolio(s), and does not ordinarily recommend brokers, if the client or a client family member requests that FOALLC recommend a broker-dealer, the factors that FOALLC will take into consideration in making its recommendation will be solely in the interest of the client. Commission levels, quality of execution, client convenience and regulatory issues will be the primary drivers of any FOALLC recommendations of specific broker-dealers, with minimizing the commission cost usually the overarching consideration. FOALLC does not manage money, per se, so does not have the authority to and does not direct commission business; moreover, FOALLC has no interest in receiving “soft dollar” services for itself, does not seek such services and will only accept services such as research reports (proprietary or third-party), without charge, if that service is of direct benefit to and used solely for the benefit of the client. Thus FOALLC has no incentive to recommend one broker over another. In the instance that a client may request or be required by his/her (regulated) employer to use a given broker where the commissions charged by that broker are higher than available elsewhere, execution less favorable, and/or reporting deemed less desirable, that information will be communicated to the client.

Review of Accounts – Client accounts are reviewed on a periodic basis (typically monthly), with written reports typically prepared quarterly. A review might also be triggered by market action, a change or pending change in the tax code, interest rates, the investment outlook, generally, and/or client-specific considerations. The periodic written reports generally contain a review of the performance of the portfolio(s) as compared to appropriate benchmarks over various timeframes. They also typically include an analysis of and commentary on the investment environment, the outlook for the economy, interest rates and other overriding factors likely to impinge on investment success. The reports and other matters of concern to clients are subsequently reviewed in detail at in-person meetings and/or telephone conference calls with the clients.

Client Referrals and Other Compensation – As a fee-only advisor, FOALLC does not accept any compensation or other economic benefit other than the fees it charges its clients, thus we avoid conflicts of interest such as might develop were we to accept compensation for a client referral or for the providing of investment advice or other advisory services to our clients. FOALLC does not compensate any third-party person for a referral of a prospective client to us.

Custody – FOALLC does not have nor does it seek custody of any client funds or securities.

Investment Discretion – FOALLC does not have nor will it accept investment discretionary authority to manage securities accounts on behalf of clients.

Voting Client Securities – FOALLC does not have nor seek authority to vote client securities. Typically the portfolio manager, engaged by the client, votes the shares. In cases where the client has chosen to work through a registered representative, proxies and other solicitations would be received directly by the client. FOALLC is always receptive to any client inquiry, thus questions regarding a particular solicitation would be welcome via phone, email, postal mail or in person.

Financial Information – FOALLC does not require nor solicit prepayment of \$500 or more in fees per client, six months or more in advance.

Appendix

Educational Background and Business Experience

Charles S. Comer, CMT* - Managing Member

Before co-founding FAMILY OFFICE ADVISORS LLC, Charles S. Comer built a widely recognized career in the investment industry. Published in *Barron's* and a frequent guest on television programs from *Wall Street Week* to *CNBC* to network news programs, Mr. Comer's 30-plus years of hands-on securities market experience gives Family Office Advisors the depth of investment perspective to capitalize on opportunities and to avoid pitfalls less seasoned investors might not recognize.

Mr. Comer's reputation and extensive investment knowledge was recognized by his peers, who elected him President of the New York Society of Security Analysts (now named the CFA Society of New York). He was also elected President of the Market Technicians Association (now known as the CMT Association). He remains active in those organizations and in other professional societies including the CFA Institute (formerly the Association for Investment Management and Research - AIMR), where he was a long-serving member of the Disciplinary Review Committee, responsible for enforcing the Association's Code of Ethics and Standards of Professional Conduct. He was selected to receive the CFA Institute's 2007 Special Service Award. Mr. Comer holds the professional designation, Chartered Market Technician* and is registered with the New York Stock Exchange (NYSE) the Financial Industry Regulatory Authority (FINRA), and other exchanges and States; he has passed the relevant examinations and/or registration requirements for Series 7, 16, 24, 63, 65, 79, 86, and 87 registrations. Mr. Comer serves as an elected Trustee and Deputy Mayor of the Village of Baxter Estates in Long Island, New York. Born in 1942, he earned his B.A. in Economics and Foreign Trade at the University of the Americas in Mexico City.

Mr. Comer served as Vice President and Strategist for Oppenheimer & Company. At Credit Lyonnais Securities he held the titles of Managing Director and Senior Vice President, Director of Research and Global Research Coordinator. He was the Director of Research and subsequently Chief Compliance Officer of boutique investment bank MLV LLC. He previously served as a securities analyst and Manager at Paine Webber and at Prudential Bache Securities and as a Managing Director and Research Project Manager at SunGard Securities. His extensive experience, strategic vision and in-depth knowledge of the securities markets have created a demand for his services at seminars and numerous teaching engagements. See also **Other Financial Industry Activities and Affiliations on page 4** for additional business activities and affiliations.

Andrew D. Stone, Esq. - Member**

Andrew D. Stone is an attorney at law, licensed under the laws of the States of New York and New Jersey, and has practiced law for the past 40 years.

From 1992 through 2011, he served as General Counsel for McMahan Securities Co. L.P., a broker/dealer
Family Office Advisors LLC

registered with the SEC and FINRA, and the Argent Group of investment funds and advisers, located in Greenwich, Connecticut. Both firms specialized in convertible securities and at their peak, the Argent Group of funds had over \$4 billion of investor capital under management. Prior to joining McMahan Securities and Argent, Mr. Stone was in private practice as a general corporate, securities, and real estate attorney for more than 20 years, most of which was spent with major New York City law firms, including Weil, Gotshal & Manges, Rogers & Wells, and Wien, Malkin & Bettex.

Mr. Stone has written numerous articles on the private placement of securities and other investment matters that have appeared in the University of Pennsylvania Law Review, The Business Lawyer (published by the American Bar Association), and the Journal of Real Estate Finance.

He received a JD degree from the University of Pennsylvania Law School in 1971, and a BA degree (with Honors in Government) from Wesleyan University in Middletown Connecticut in 1968. Upon graduation from law school, Mr. Stone served as law clerk to the Hon. Nathan L. Jacobs, a Justice of the Supreme Court of the State of New Jersey.

*Chartered Market Technician (CMT) is a designation conferred by the CMT Association (formerly the Market Technicians Association) upon successful completion of a series of three examinations that test the candidate's understanding of the discipline's body of knowledge and application of technical tenets. It is a certification process in which candidates are required to demonstrate proficiency in a broad range of technical analysis subjects. Passing levels I and II of the CMT program is recognized by the SEC as sufficient evidence of competence that the Series 86 Research Analyst Qualification Examination can be waived. CMTs agree to abide by a code of ethics that requires that they maintain at all times the highest standards of professional competence, integrity and judgment and that they act with dignity and in an ethical manner in all dealings with clients and others, as well as strictly comply with the applicable laws and regulations of any government, governmental agency and regulatory organization with jurisdiction over his or her professional activities. The code requires that members not publish or make statements which they know or have reason to believe are inaccurate or misleading. The code of ethics further requires that the private affairs of clients are to be kept in strict confidence.

**The use of the reference 'Esq.' after Mr. Stone's name refers to his status as an attorney at law. He is admitted to practice law in the States of New York and New Jersey.

Disciplinary Information

Neither Charles Comer nor Andrew D. Stone has any disciplinary event history.

Other Business Activities

FOALLC provides "Wealth Management Counsel" to its clients. This encompasses advice beyond the field of "investments" and comprises guidance on topics including financial planning, budgeting, cash management, insurance, real estate transactions, business activities, Social Security planning, estate

planning, tax planning, succession planning, financial mentoring, and philanthropic activities, among others.

Charles Comer, the Managing Member of FOALLC, also provides compliance-related consulting services to BTIG, LLC, a broker-dealer. There is no business relationship between the activities of Family Office Advisors and BTIG. FOALLC does not believe this “other financial industry activity” of Charles Comer has any material effect on the firm or its clients.

Additional Compensation

No one who is not a client provides compensation or other economic benefit for the provision of advisory services to supervised persons of Family Office Advisors LLC.

Supervision

Charles Comer, Managing Member and Chief Compliance Officer of the firm, supervises all activities of the firm. The contact telephone number for Mr. Comer is (212) 697-7800.

Requirements for State-Registered Advisors

Mr. Comer has passed the Series 65 Uniform Investment Adviser Law Examination as required of practitioners providing investment advice to clients of a Registered Investment Advisor in New York State.