

Harewood Partners LLC

4408 Norbeck Road
Rockville, MD 20853

Phone: 240-389-1947

Fax: 240-389-1961

Email: Hendon@Harewoodpartners.com

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**Firm Brochure
(Part 2A of Form ADV)**

This Brochure provides information about the qualifications and business practices of Harewood Partners LLC. If you have any questions about the contents of this brochure, please contact us at 240-389-1947 or e-mail Hendon@Harewoodpartners.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.

Harewood Partners LLC is a registered investment adviser. Registration of an investment adviser does not imply a certain level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Harewood Partners LLC also is available on the SEC's website at www.adviserinfo.sec.gov and the company's website at <http://www.harewoodpartners.com>.

Item 2: Material Changes

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 240-389-1947 or by e-mail at Hendon@Harewoodpartners.com.

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Item 4: Advisory Business

Harewood Partners LLC (“Harewood”) was founded in March 2012 by Shawn M. Hendon who is the sole owner of the firm. Harewood is organized as a Maryland limited liability company. Harewood has one office located in Rockville, Maryland. Harewood is an independent, owner-operated investment adviser registered in the state of Maryland.

Harewood provides value-oriented discretionary investment advice on equity and fixed income securities based on fundamental research, independent analysis and a long-term (three to five year) time horizon. Harewood establishes an understanding of each client’s individual investment objectives and formulates an investment program structured to achieve each client’s goals. Harewood offers portfolio management services to individuals, partnerships, trusts, estates, charitable organizations, and corporations.

Harewood provides continuous advice to advisory clients regarding investment of assets based on the individual needs of each client. Client investment objectives, risk tolerances, and time horizon are established at the beginning of each client relationship and are routinely monitored throughout the relationship. Clients may place restrictions on the discretionary authority given to Harewood by restricting the types of securities that Harewood can trade for the client. Harewood will manage advisory accounts on a discretionary basis.

As of December 31, 2019 Harewood Partners LLC had \$23,777,521 under management..

Item 5: Fees and Compensation

Harewood’s fees are generally described below and are detailed in each client’s advisory agreement. Harewood’s fee for private account management is based on an annual percentage of the account’s assets under management. The current fee schedule is:

0.50% on the first \$10 million; and
0.375% thereafter

Harewood reserves the right, in its sole discretion, to negotiate and to charge different fees for certain accounts based on the client’s particular needs, as well as overall financial condition, goals, risk tolerance, overall relationship with the firm and other factors unique to the client’s particular circumstances. Therefore, some clients may pay more or less than other clients for the same or similar management services depending on, for example, account inception dates, number or value of related accounts, total assets under management by Harewood, fee negotiations or fee waivers.

Fees are calculated and payable quarterly (or annually, as agreed) in arrears. The quarterly fee shall be based on the average daily balance for each calendar quarter. The initial fee shall be prorated and based on the number of days during the quarter for which advisory services were rendered. If the client terminates the relationship prior to the end of the period, the fee will be prorated for the number of days during the quarter for which advisory services were rendered and the last day of such period shall be the effective date of the termination of the advisory relationship.

Fees will be billed directly to client accounts to the extent that clients authorize Harewood to receive payment directly from their custodians. Harewood will send the client’s custodian quarterly a bill for the amount of its fee. The custodian will send quarterly statements showing all transactions in the account, including fees paid to Harewood, directly to Harewood clients with a copy to Harewood. Alternately,

some clients may choose to authorize their custodians to calculate the fee owed to Harewood pursuant to that client's advisory contract and pay that amount directly to Harewood. In such cases, Harewood will neither calculate the amount owed nor send a bill.

In addition to the fees charged by Harewood for the advisory services rendered, clients of Harewood bear certain other fees, expenses and costs that are incidental or related to the maintenance of an account or the buying, selling and holding of investments including, but not necessarily limited to: (1) custodial charges; (2) brokerage fees, commissions and other related transaction costs and expenses; (3) governmental charges, taxes and duties; (4) transfer fees, registration fees and other expenses associated with buying, selling or holding investments; and (5) withholding taxes payable and required to be withheld by issuers or their agents. For additional information about brokerage fees, commissions and other related transaction costs and expenses, please refer to the section below entitled "Brokerage Practices." Clients whose uninvested assets are swept into money market mutual funds for short-term cash management purposes by their custodian will also bear the additional fees and expenses assessed by such money market and other mutual funds to the extent of their investment in such funds. When money market funds are used for cash management purposes, the client, in effect, may pay two advisory fees with respect to the amount of assets so invested (i.e., the money market fund's fees and expenses and that portion of the Harewood management fee attributable to such assets).

Harewood's investment advisory agreement is terminable by either party generally on 30 days' notice and will continue to be in effect until written notice of termination is given by either party.

Item 6: Performance Based-Fees

Performance-Based Fees

Harewood does not assess performance-based fees.

Harewood does not use a performance-based structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Harewood provides portfolio management services to:

- individuals,
- partnerships,
- trusts, estates, or charitable organizations,
- corporations or other business entities.

Harewood requires a minimum account size of \$500,000 for separately managed accounts. This account size may be negotiable.

Item 8: Method of Analysis, Investment Strategies and Risk of Loss

Client should be aware that while Harewood does not limit its advice to particular types of investments, mandates may be limited to certain types of securities (*e.g.*, common stocks) and may not be diversified. The accounts managed by Harewood are generally not intended to provide a complete investment program and Harewood expects that the assets it manages do not represent all of the client's assets. Clients are responsible for appropriately diversifying their assets to guard against the risk of loss.

Method of Analysis and Investment Strategies

Harewood was established to manage equity, fixed income and balanced account portfolios with the goal of prudently growing capital and income over time.

The equity investment approach is value-oriented, employing fundamental business analysis and a long term investment horizon. Investment in publicly traded common stocks represents partial ownership of underlying operating business, and we pay more attention to the long term results of the businesses than short term price movements. We do not forecast stock market direction or engage in market timing. We seek to invest in good businesses with conservative financial practices, led by shareholder-oriented management and available at reasonable prices.

Fixed income investment is focused primarily on capital preservation and income generation, with less emphasis on total return. We do not forecast interest rates or changes in the yield curve, and selection is limited to investment grade securities.

Harewood utilizes information, reports and data from various external sources. Investment decision-making with respect to accounts managed is based primarily upon Harewood's internal research and analytical capabilities, including the research and analytical experiences and expertise of Harewood's investment research professionals. In addition, Harewood utilizes contact with corporate management. The investment research professionals may visit the facilities of issuers whose securities represent potential investments and meet with management to determine company quality and suitability for long term investing.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. Investors face the following types of risks:

Market Risk

The price of a security or bond may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Interest Rate Risk

Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Investment Adviser Risk

Harewood's ability to choose suitable investments has a significant impact on the ability of the Strategies to meet their investment objectives.

Value Investing Style Risk

Because Harewood invests assets in value stocks (investments characterized generally by valuation metrics at or below general market levels), account performance may at times be better or worse than the performance of accounts that focus on other types of stock strategies (e.g. growth stocks), or that have a broader investment style.

Risks of Small and Medium Capitalization Companies

Investments in stocks of small and medium capitalization companies may subject an account to additional risks. The earnings and prospects of these companies are more volatile than larger companies. Small and medium capitalization companies may have limited product lines and markets and may experience higher failure rates than do larger companies.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Harewood or the integrity of Harewood's management. Harewood has no information to disclose applicable to this Item.

Item 10: Other Financial Industry Activities and Affiliations

Harewood is registered as an investment adviser in Maryland. Harewood does not have any arrangements that are material to its advisory clients with a related person who is a broker/dealer, investment company, other investment adviser, financial planning firm, commodity pool operator, commodity trading advisor or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

Mr. Hendon, Managing Partner, is also President and Principal of Torray LLC (Torray) and co-manager of the Torray Fund (TORYX), an SEC-registered investment company in Bethesda, MD. There is no intermingling of Harewood and Torray business activities. Mr. Hendon maintains a separate office space where all Harewood client information and documentation is stored, preserving client privacy. Transactions for Harewood clients are done in compliance with existing trade policies of Harewood and Torray to avoid any potential conflicts of interest.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Harewood employees must comply with a Code of Ethics and Insider Trading Policy. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The Code describes Harewood's high standard of business conduct, and its fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions

- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

From time to time, employees and members of Harewood will have interests in securities owned by or recommended to Harewood's clients. As these situations may present a potential conflict of interest, Harewood's code contains procedures relating to personal securities transactions and insider trading that are designed to identify and mitigate or prevent actual conflicts of interest.

The Code restricts the purchase and sale by "access persons" for their own accounts of certain securities which have been purchased or sold for clients within certain time limits. The purchase or sale of securities in client accounts can take place over different lengths of time. To avoid any conflicts with client interests, when securities are being purchased or sold on behalf of clients, or under serious consideration for imminent purchase or sale, all employees must defer any transactions in such securities for their personal accounts for one trading date before and after the conclusion of any transactions on behalf of clients.

Harewood will provide a copy of the Code of Ethics and Insider Trading Policy to any client or prospective client upon request.

Mr. Hendon is the Chief Compliance Officer of Harewood. He reviews all employee trades each quarter including his own trades. The personal trading review ensures that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

Item 12: Brokerage Practices

Generally, Harewood is retained with respect to client accounts on a discretionary basis and is authorized to make the following determinations in accordance with clients' specified investment objectives without client consultation or consent before a transaction is effected:

- Which securities to buy or sell.
- The total amount of securities to buy or sell.
- The broker or dealer through whom securities are bought or sold.
- The commission rates at which securities transactions for client accounts are effected.
- The prices at which securities are to be bought or sold, which may include dealer spreads or mark-ups and transaction costs.

Harewood may, however, accept advisory accounts with limited discretion or where investments are client-directed pursuant to the advisory agreement.

Selection Criteria for Brokers and Dealers

Harewood places orders for the purchase or sale of securities with the primary objective of obtaining the best price and execution from responsible broker-dealers at competitive commission rates. Harewood insists on a high standard of quality regarding execution services and seeks to deal only with brokers that it believes can meet that standard. The commission rates paid by Harewood and the quality of execution received are reviewed regularly by the portfolio manager(s) and the CCO. The commission paid to the broker for effecting transactions will be competitive but might be higher than the lowest available rate

that another broker might have charged if Harewood determines, in good faith, that the commissions are reasonable in relation to the value of brokerage services provided.

Harewood's objective in selecting brokers and dealers and in effecting portfolio transactions is to seek to obtain the best combination of price and execution with respect to its accounts' portfolio transactions. The best net price, giving effect to brokerage commissions, spreads and other costs, is normally an important factor in this decision, but a number of other judgmental factors are considered as they are deemed relevant. The factors include, but are not limited to: Harewood's knowledge of negotiated commission rates and spreads currently available; the nature of the security being traded; the size and type of the transaction; the nature and character of the markets for the security to be purchased or sold; the desired timing of the trade; the activity existing and expected in the market for the particular security; confidentiality; the execution, clearance and settlement capabilities as well as the reputation and perceived soundness of the broker-dealer selected and others which are considered; dependability; reputation; breadth of products and services; Harewood's knowledge of actual or apparent operational problems of any broker-dealer; the broker-dealer's execution services rendered on a continuing basis and in other transactions; and the reasonableness of spreads or commissions.

Harewood may also use an Electronic Communications Network ("ECN") or Alternative Trading System ("ATS") to effect such over-the-counter trades when, in Harewood's judgment, the use of an ECN or ATS may result in equal or more favorable overall executions for the transactions. Harewood will pay a commission to an ECN or ATS that, when added to the price, is still better than the overall execution price that might have been attained trading "net" with a market maker. In some cases, a broker may be recommended to an individual account to provide custodial or other services for the client. In those cases, transactions are effected for the account through the custodial broker while maintaining the primary objective noted above of obtaining the best price and execution at competitive commission rates.

Research and Other Soft Dollar Benefits

Harewood does not receive soft dollar benefits.

Brokerage for Client Referrals

On occasion, Harewood may receive a client referral from a broker-dealer that Harewood uses to execute clients' securities transactions. A conflict of interest may arise, however, between a client's interest in obtaining best execution and Harewood's interest in receiving future referrals. Harewood may use such broker-dealer subject to its duty to seek best execution on clients' transactions. Harewood does not direct commissions to compensate for referrals.

Directed Brokerage

Clients may limit Harewood's discretionary authority in certain situations. In particular, clients may direct Harewood to use particular broker-dealers to execute portfolio transactions for their accounts. Where a client directs the use of a particular broker-dealer, or broker-dealers, Harewood may not be in a position to negotiate commission rates or spreads or obtain volume discounts and best price may not be achieved. In addition, transactions for a client that directs brokerage often may not be combined or "batched" for execution purposes with orders for the same securities for other accounts managed by Harewood. However, Harewood attempts to include such clients in batched transactions through "step outs" if possible. Trades for a client that has directed use of a particular broker or dealer may be placed at the end of batched trading activity for a particular security. Accordingly, directed transactions may be

subject to price movements, particularly in volatile markets, that may result in the client receiving a price that is less favorable than the price obtained for the batched order. Under these circumstances, the direction by a client of a particular broker or dealer to execute transactions may result in higher commissions, greater spreads, or less favorable net prices than might be the case if Harewood could negotiate commission rates or spreads freely, or select brokers or dealers based on best execution.

Batch Transaction and Allocation Policy

When Harewood decides to purchase or sell the same securities for several clients at approximately the same time, as part of the duty to seek best execution, Harewood may, but is not required to, “bunch” or batch together purchases or sales for several clients. Batched trades are allocated, in a fair and equitable manner over time, across participating client accounts. Harewood may include proprietary accounts in such aggregate trades subject to its duty to seek best execution and its Code of Ethics. Directed brokerage clients may be unable to participate in batched transactions. However, Harewood endeavors to include such clients in batched transactions through the use of “step-outs” when possible. While Harewood may effect batched trades to facilitate better execution, Harewood may direct transactions to brokers based on both their ability to provide high quality execution and the nature and quality of research services, if any, such brokers provide to Harewood. As a result, clients may not always pay the lowest available commission rates where their trades are effected in this manner, so long as Harewood believes that it is nonetheless obtaining best price and execution.

Harewood may also consider the following when allocating trades: (1) cash flow changes (including available cash, redemptions, exchanges, capital additions and capital withdrawals) may provide a basis to deviate from a pre-established allocation as long as it does not result in an unfair advantage to specific clients or types of clients over time; (2) clients with specialized investment objectives or restrictions emphasizing investment in a specific category of securities may be given priority over other clients in allocating such securities; (3) the desire to achieve “round lots”; (4) the client’s asset size; and (5) the client’s current holdings of the security. *Pro rata* allocation is generally used when a batch order, which usually involves only non-directed accounts and seeks only liquid, actively traded securities, cannot be fully executed in a single day, unless the client has expressly directed otherwise. The partial fill is generally allocated among the participating client accounts based on the size of each account’s original order, subject to rounding in order to achieve “round lots”. Unexecuted orders will continue until the block order is completed or until all component orders have been cancelled. New orders for the same security will be aggregated with any remaining unexecuted orders and will continue in the same manner. Harewood will generally apply a minimum order allocation amount of 100 shares, which may be adjusted based on market convention associated with the particular security. If remaining positions are too small to satisfy the minimum order amount, Harewood may decide to allocate the remaining shares to those accounts seeking large positions which were unfilled. Harewood may also decide to allocate remaining shares to those accounts whose orders would be completed as a result of the allocation. Other methods of allocation may be used where deemed by Harewood to be appropriate. Random allocation is especially appropriate when the transaction size is too limited to be effectively allocated *pro rata* among all eligible managed accounts.

Item 13: Review of Accounts

Account reviews are performed at least monthly by Mr. Hendon. Account reviews are performed more frequently when market conditions dictate.

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

The account reviewer, Mr. Hendon, is the sole owner of Harewood. He considers the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients may receive periodic written communications on at least a quarterly basis. The written communications may include a market review, a summary of market performance, a summary of the client's portfolio performance and asset allocation and a portfolio statement.

Item 14: Client Referrals and Other Compensation

Harewood does not compensate any person or entity for client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians. Qualified custodians provide account statements directly to clients at their address of record at least quarterly. Clients should carefully review the statements they receive from their custodian.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to any periodic written communications provided by Harewood.

Item 16: Investment Discretion

Discretionary Authority for Trading

Harewood accepts discretionary authority to manage securities accounts on behalf of clients. Harewood has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Clients may place restrictions on the discretionary authority given to Harewood by restricting the types of securities that Harewood can trade for the client. Prior to assuming discretionary authority, Harewood meets with clients to review financial objectives, provides Harewood's Brochure and executes an Investment Management Agreement with the client.

The client approves the custodian to be used and the commission rates to be paid to the custodian. Harewood does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in clients' accounts on their behalf so that Harewood may efficiently implement the investment policy that has been approved.

Item 17: Voting Client Securities

Harewood has written proxy voting policies and procedures in place. Under these policies and procedures, Harewood votes proxies relating to portfolio securities in the best interests of clients, unless the client contract specifies that Harewood will not vote. While Harewood has written guidelines for certain issues on which votes may be cast, each proxy vote may ultimately be cast on a case-by-case basis, taking into consideration any contractual obligations under the advisory agreement or comparable document and all relevant facts and circumstances at the time of the vote. Harewood considers the quality of management and good corporate governance to be important factors in the security selection process, and strives to invest in companies with management teams that exhibit honesty, integrity and a shareholder orientation. Such managements are generally believed to be in the best position to make decisions that serve the interests of shareholders. Accordingly, a high degree of emphasis is placed on managements' opinions and proxies are often voted in accordance with managements' recommendations. However, Harewood votes against management on proposals where it perceives a conflict exists between management and clients' interests, such as those which may insulate management or diminish shareholder rights. Harewood may seek to change the views of management, may join with other investment managers in seeking to submit a shareholder proposal to a company or may oppose a proposal submitted by the company. Any such actions are primarily based on the expected impact of such actions on fundamental share value.

Harewood is responsible for ensuring that votes are cast and records are maintained. In determining how to vote a given proxy, Harewood relies on its policies and procedures except to the extent superseded by a client's own proxy voting policies or to the extent that a material conflict of interest is identified. If there is no material conflict of interest, Harewood will cast the vote in accordance with the recommendation of portfolio management. In the event of an organizational conflict, Harewood will follow its procedures for resolving material conflicts as identified below. Harewood acknowledges its responsibility for identifying material conflicts of interest relating to voting proxies. Relevant Harewood employees must disclose any personal conflicts such as officer or director positions held by them, their spouses or close relatives in the portfolio company. When a material conflict of interest between Harewood's interests and its clients' interests appears to exist, Harewood may eliminate the conflict by choosing one of several options which include: (1) vote in accordance with Harewood's policies and procedures if it involves little or no discretion; (2) vote as recommended by a third party service if Harewood uses such a service; (3) if practical, notify affected clients of the conflict of interest and seek a waiver of the conflict; (4) if agreed upon in writing with the client, forward the proxies to affected clients allowing them to vote their own proxies; (5) if possible, erect information barriers around the person or persons making voting decisions sufficient to insulate the decision from the conflict; or (6) "echo" or "mirror vote" the proxies in the same proportion as the votes of other proxy holders that are not Harewood clients. To the extent that a portfolio manager serves as a director, trustee or officer of a portfolio company, Harewood has adopted Chinese Wall policies to ensure that such persons are not involved with any aspect of the proxy voting process with respect to that company. Clients may obtain copies of Harewood's written proxy voting policies and procedures as well as information on how proxies were voted for their own account by requesting such

information from Harewood at the address and phone listed on the Cover Page of this Brochure. Harewood will not disclose proxy votes for a client to other clients or third parties unless specifically requested, in writing, by the client. However, to the extent that Harewood may serve as a sub-adviser to another adviser to a client, Harewood will be deemed to be authorized to provide proxy voting records on such client accounts to such other adviser.

Item 18: Financial Information

Harewood does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Harewood does not require prepayment of fees of more than \$500 per client, six months or more in advance.

Item 19: Requirements for State-Registered Advisers

Principal Executive Officer and Management Persons

Please see Part 2B of this form for details.

Other Businesses

Please see Part 2B of this form for details. Harewood is not involved in any other businesses.

Performance-Based Fees

Please see Item 6, Page 6 above.

Disciplinary Disclosures

Harewood and its employees have not been involved in or found liable in an arbitration claim or civil, self-regulatory or administrative proceeding.

Privacy Notice

You have entrusted to our care not only your hard-earned money but personal and financial data as well. We understand that your relationship with us is based upon trust, and that as your financial stewards you expect us to act responsibly and in your best interests. Your personal and financial data is your private information, therefore, in keeping with our responsibility to you and our own company mission, we are committed to holding ourselves to the highest ethical standards in its safekeeping and use. This notice is intended to help you understand how we fulfill this commitment.

We do not sell client information to anyone. Your information is used by us primarily to complete transactions you request or have authorized us to make on your behalf. From time to time, we may collect a variety of information about you that is either required or necessary to provide personalized financial services to you. This data includes information we receive from you on applications and forms, via telephone, and through email; information about your

transactions with us, our affiliates or others (such as purchases, sales, or account balances); or information we receive from a consumer reporting agency.

We do not disclose any non-public personal information about our clients or former clients to anyone, except as permitted by applicable law or regulation. For example, we may share this information with others in order to process your transactions. We may provide any of the information we collect to non-affiliated third party companies which may provide marketing and administrative services on our behalf, such as printing and mailing. We will require these companies to protect the confidentiality of this information and to use it only to perform the services for which we hired them; they are not permitted to use or share this information for any other purpose.

We may also disclose non-public personal information to government agencies and regulatory organizations when required or permitted by law.

We seek to protect the security and confidentiality of non-public personal information about clients or former clients. We restrict access to nonpublic personal information about you to those employees who need to know that information in order to serve you. To protect your personal information within our company, we maintain physical, electronic and procedural safeguards to protect your non-public information.

Form ADV Part 2B – Investment Adviser Brochure Supplement

Harewood Partners LLC Form ADV Part 2B Investment Adviser Brochure Supplement

Shawn M. Hendon
4408 Norbeck Road
Rockville, MD 20853

Phone: 240-389-1947

Fax: 240-389-1961

Email: Hendon@Harewoodpartners.com

June 12, 2020

This brochure supplement provides information about Shawn M. Hendon that supplements Harewood Partners LLC's brochure. Please contact Shawn M. Hendon at the above email or telephone number if you did not receive Harewood Partners LLC's brochure or if you have any questions about the content of this supplement.

Additional information about Shawn M. Hendon is available on the SEC's website at www.adviserinfo.sec.gov and the company's website <http://www.harewoodpartners.com>.

Educational Background and Business Experience

Shawn M. Hendon, CFA.

Mr. Hendon, the Managing Partner, has over 35 years investment experience and is the founder of Harewood Partners LLC (2012).

Prior to forming Harewood Partners LLC, he was Vice President of Torray LLC, an SEC-registered investment adviser, and co-manager of the Torray Fund, where his primary responsibilities included research and portfolio management (2008 – 2012). Previously, Mr. Hendon was a partner and co-founder of Rockledge Partners, LLC, an SEC-registered investment adviser located in Bethesda, Maryland (2003 – 2007). He served as Managing Director and Portfolio Manager for Lockheed Martin Investment Management Company (1979-2003).

Mr. Hendon has a BA degree from Georgetown University (1973), an MBA from George Washington University (1977), and holds the designation of Chartered Financial Analyst (1983). The CFA program is a graduate-level, self-study program that combines a broad curriculum with professional conduct requirements, culminating in three sequential examinations.

Mr. Hendon serves on the boards of several non-profit organizations and a Washington area Catholic high school. He was born May 24, 1951.

Disciplinary Information

Neither Harewood Partners LLC nor Mr. Hendon have been involved in any activities resulting in a disciplinary disclosure.

Other Business Activities

Mr. Hendon, Managing Partner, is also President and Principal of Torray LLC (Torray) and co-manager of the Torray Fund (TORYX), an SEC-registered investment company in Bethesda, MD.

Additional Compensation

None.

Supervision

Mr. Hendon supervises himself as he is the owner and sole employee of Harewood Partners LLC. He will establish, maintain and enforce written supervisory guidelines that are reasonably designed to achieve compliance with Regulation .13 of the Maryland Securities Act, Corporations and Associations Article, Title 11, Annotated Code of Maryland and the rules and regulations promulgated thereunder.

Arbitration Claims

None.

Self-Regulatory Organization or Administrative Proceeding

None.

Bankruptcy Petition

None.