

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Luke M. Harder, CFP®  
Private Wealth Advisor Associate**

**Effective: April 17, 2025**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Luke M. Harder, CFP®, (CRD# 7448532) in addition to the information contained in the Claro Advisors LLC (“Claro” or the “Advisor”, CRD# 160294) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Claro Disclosure Brochure or this Brochure Supplement, please contact us at (800) 604-2838 or by email at [info@claroadvisors.com](mailto:info@claroadvisors.com).

Additional information about Mr. Harder is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7448532.

## Item 2 – Educational Background and Business Experience

Luke M. Harder, CFP®, born in 2001, is dedicated to advising Clients of Claro as a Private Wealth Advisor Associate. Mr. Harder earned a Bachelors of Science from Suffolk University in 2023. Additional information regarding Mr. Harder’s employment history is included below.

### Employment History:

Private Wealth Advisor Associate, Claro Advisors LLC	04/2025 to Present
Registered Representative, Northwestern Mutual Investment Services, LLC	02/2023 to 04/2025
Lead Advisor, Convergence Capital - Northwestern Mutual	09/2022 to 03/2025
Student, Suffolk University	09/2019 to 05/2023
Intern, Edge Federal Credit Union	07/2019 to 08/2020

### CERTIFIED FINANCIAL PLANNER® Professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER® professional or a CFP® professional, and I may use these and the other certification marks (the “CFP Board Certification Marks”) that Certified Financial Planner Board of Standards Center for Financial Planning, Inc. has licensed to CFP Board in the United States. The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor’s degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor’s or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board

Certification Marks:

**Claro Advisors LLC**  
100 High Street; Suite 950, Boston, MA 02110  
Phone: (800) 604-2838 \* Fax: 800-508-1983  
[claroadvisors.com](http://claroadvisors.com)

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the Client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A Client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the Client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Harder.*** Mr. Harder has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Harder.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Harder.***

However, we do encourage you to independently view the background of Mr. Harder on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7448532.

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

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#### Insurance Agency Affiliations

Mr. Harder is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Harder’s role with Claro. As an insurance professional, Mr. Harder will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Harder is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Harder or the Advisor. Mr. Harder spends approximately 5% of his time per month in this capacity.

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

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Mr. Harder has an additional business activity where compensation is received that is detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Harder serves as a Private Wealth Advisor Associate of Claro and is supervised by Jennifer Street, the Chief Compliance Officer. Ms. Street can be reached at (800) 604-2838.

Claro has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Claro. Further, Claro is subject to regulatory oversight by various agencies. These agencies require registration by Claro and its Supervised Persons. As a registered entity, Claro is subject to examinations by regulators, which may be announced or unannounced. Claro is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.