

# Longview Financial Advisors, LLC

## Firm Brochure

*This brochure provides information about the qualifications and business practices of Longview Financial Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (866) 998-3998 or by email at: [pjponzio@longviewfp.com](mailto:pjponzio@longviewfp.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 Longview Financial Advisors, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Longview Financial Advisors, LLC's CRD number is: 158001*

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*Registration does not imply a certain level of skill or training.*

Version Date: 3/28/2012

## **Item 2: Material Changes**

Longview Financial Advisors, LLC has no material changes to report since the previous ADV amendment filed on January 3, 2012.

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Longview Financial Advisors, LLC is a Limited Liability Company organized in the state of Delaware.

This firm has been organized since October 2005, but has only been in business since July 2011, and the principal owner is Peter Joseph Ponzio.

### **B. Types of Advisory Services**

Longview Financial Advisors, LLC (hereinafter "LFA") offers the following services to advisory clients:

#### ***Investment Supervisory Services***

LFA offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. LFA creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

LFA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. LFA will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

#### ***Financial Planning***

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on fixed fees or hourly fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement.

### ***Services Limited to Specific Types of Investments***

LFA generally limits its investment advice and/or money management to mutual funds and ETFs. LFA may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

LFA will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by LFA on behalf of the client. LFA will not use "model portfolios" but rather a specific set of recommendations for each client based on their personal restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent LFA from properly servicing the client account, or if the restrictions would require LFA to deviate from its standard suite of services, LFA reserves the right to end the relationship.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. LFA DOES NOT participate in any wrap fee programs.

### **E. Amounts Under Management**

LFA has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0.00	\$104,080,349.15	12/31/2011

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Investment Supervisory Services Fees*

Total Assets Under Management	Annual Fee
\$1 - \$1,000,000	2.00%
\$1,000,001 - \$5,000,000	1.50%
Above \$5,000,000	1.00%

These fees are negotiable depending upon the needs of the client and complexity of the situation and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid monthly in arrears, and clients may terminate their contracts with thirty days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

#### *Financial Planning Fees*

##### *Fixed Fees*

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$500 and \$25,000. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

##### *Hourly Fees*

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is \$100 - \$500. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

## **B. Payment of Fees**

### ***Payment of Investment Supervisory Fees***

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid monthly in arrears.

### ***Payment of Financial Planning Fees***

Hourly Financial Planning fees are paid via check in arrears upon completion. Because fees are charged in arrears, no refund is necessary.

Fixed Financial Planning fees are paid via check in arrears upon completion. Because fees are charged in arrears, no refund is necessary.

## **C. Clients Are Responsible For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, brokerage fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by LFA. Please see Item 12 of this brochure regarding broker/custodian.

## **D. Prepayment of Fees**

LFA collects its fees in arrears. It does not collect fees in advance.

## **E. Outside Compensation For the Sale of Securities to Clients**

Peter Joseph Ponzio in his role as a registered representative accepts compensation for the sale of securities to LFA clients.

### ***1. This is a Conflict of Interest***

LFA and its supervised persons will accept compensation for the sale of securities or other investment products, including asset based sales charges or services fees from the sale of mutual funds to its clients. This presents a conflict of interest and gives the supervised person and LFA an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which LFA receives compensation, LFA will document the conflict of interest in the client file and inform the client of the conflict of interest.



## ***2. Clients Have the Option to Purchase Recommended Products From Other Brokers***

Clients always have the option to purchase LFA recommended products through other brokers or agents that are not affiliated with LFA.

## ***3. Advisory Fees in Addition to Commissions or Markups***

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

# **Item 6: Performance-Based Fees and Side-By-Side Management**

LFA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

# **Item 7: Types of Clients**

LFA generally provides investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ Pension and Profit Sharing Plans

## ***Minimum Account Size***

There is no account minimum.

# **Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss**

## **A. Methods of Analysis and Investment Strategies**

### ***Methods of Analysis***

LFA's methods of analysis include fundamental and technical analysis.

*Fundamental analysis* involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

*Technical analysis* involves the analysis of past market data; primarily price and volume.

### ***Investment Strategies***

LFA uses long and short term trading strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### ***Methods of Analysis***

*Fundamental analysis* concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

*Technical analysis* attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

### ***Investment Strategies***

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **C. Risks of Specific Securities Utilized**

LFA generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. Mutual Funds – Stock Market Risk, Volatility Risk, Fixed Income Securities Risk, Investment Selection Risk. ETFs – Stock Market Risk, Volatility Risk, Fixed Income Securities Risk, Investment Selection Risk

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SR) Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Peter Joseph Ponzio is a registered representative of Sunbelt Securities Inc. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. LFA always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of LFA in their capacity as a registered representative.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither LFA nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Peter Joseph Ponzio is a registered representative of Sunbelt Securities Inc. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. LFA always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to

implement the plan through any representative of LFA in their capacity as a registered representative.

Peter Joseph Ponzio is an investment adviser representative of Longview Capital Management LLC, an SEC registered investment adviser. Additionally, Peter Joseph Ponzio solicits P&C Insurance and Group Health Insurance to existing 401k customers for DVFG Companies, Inc. LFA always acts in the best interest of the client.

#### **D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections**

LFA does not utilize nor select other advisors or third party managers. All assets are managed by LFA management.

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

#### **A. Code of Ethics**

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

#### **B. Recommendations Involving Material Financial Interests**

LFA does not recommend that clients buy or sell any security in which a related person to LFA or LFA has a material financial interest.

#### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of LFA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of LFA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. LFA will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

## **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of LFA may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of LFA to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. LFA will always transact client's transactions before its own when similar securities are being bought or sold.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

The Custodian, FOLIO<sup>fn</sup>, Inc., was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. LFA will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

#### ***1. Research and Other Soft-Dollar Benefits***

LFA receives research, products, or other services from its broker-dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). There is no minimum client number or dollar number that LFA must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for LFA to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. The first consideration when recommending broker/dealers to clients is best execution.

#### ***2. Brokerage for Client Referrals***

LFA receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

LFA allows clients to direct brokerage. LFA may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients' money because without the ability to direct brokerage LFA may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

LFA maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing LFA the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

# **Item 13: Reviews of Accounts**

## **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed at least quarterly by Peter Joseph Ponzio, Chief Compliance Officer. Peter Joseph Ponzio is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at LFA are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Peter Joseph Ponzio, Chief Compliance Officer.

## **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

## **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least monthly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

Clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

LFA does not receive any economic benefit, directly or indirectly from any third party for advice rendered to LFA clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

LFA does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

LFA, with client written authority, has limited custody of client's assets through direct fee deduction of LFA's Fees only. Constructive custody of all client assets and holdings are maintained primarily at FOLIOfn, Inc. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

For those client accounts where LFA provides ongoing supervision, the client has given LFA written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides LFA discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

## **Item 17: Voting Client Securities (Proxy Voting)**

LFA will accept voting authority for client securities in certain cases. When LFA does accept voting authority for client securities, it will always seek to vote in the best interests of its clients. LFA does not maintain preapproved voting guidelines but relies on the investment committee to determine the appropriate course of action in voting client securities that is in the best interest of the client. Clients may direct LFA on how to vote client securities by communicating their wishes in writing or electronically to LFA. When voting client proxies the investment committee will always hold the interests of the clients above its own interests. Clients of LFA may obtain the voting record of LFA on client securities by contacting LFA at phone number or e-mail address listed on the cover page of this brochure. Clients may obtain a copy of LFA's proxy voting policies and procedures upon request.

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## **Item 18: Financial Information**

### **A. Balance Sheet**

LFA does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither LFA nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

LFA has not been the subject of a bankruptcy petition in the last ten years.