

EagleView Advisors, Inc.

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Part 2A of Form ADV: Brochure

Item 1: Cover Page

This brochure provides information about the qualifications and business practices of EagleView Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at (215) 257-5035. 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. Registration does not imply a certain level of skill or training.

Additional information about EagleView Advisors, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Brochure Effective Date: January 9, 2015

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Item 2: Summary of Material Changes

The material changes in this brochure from the last annual updating amendment are described below:

The full legal name of EagleView Advisors, LLC has been changed to EagleView Advisors, Inc., effective June 17, 2014.

Item 4, “Description of the Firm” has been amended to reflect the merger of Longview Capital Management, LLC.

EagleView now offers consulting services.

Vlad Uchenik was named Chief Compliance Officer on January 5, 2015.

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Item 4: Advisory Business

Description of the Firm

EagleView Advisors, Inc. (“EagleView”), formerly known as First Savings Financial Services, Inc., was incorporated in Pennsylvania in 2009. EagleView is a wholly owned subsidiary of FSB Mutual Holdings, Inc.; there are intermediate subsidiaries in the hierarchy of ownership between the two companies. In 2009, First Savings Financial Services, Inc., now EagleView Advisors, Inc., acquired the investment advisory business of Papalia Asset Management, Inc., and registered with the United States Securities and Exchange Commission (the “SEC”) as an investment advisor.

Papalia Asset Management, Inc. or its predecessor firm, Papalia Financial Services, Inc., had also been registered with the SEC, and provided investment advisory services since 2002. After the 2009 acquisition, the officers and employees of Papalia Asset Management, Inc. continued to perform the same functions for First Savings Financial Services, Inc., now known as EagleView Advisors, Inc.

In 2014, EagleView Advisors, Inc., acquired the investment advisory business of Longview Capital Management, Inc. Longview Capital Management, Inc. had also been registered with the SEC, and provided investment advisory services since 2008. After the acquisition, the employees of Longview Capital Management, Inc. continued to perform similar functions for EagleView Advisors, Inc.

Vlad Uchenik was named Chief Compliance Officer on January 5, 2015.

Advisory Services Offered

EagleView provides a combination of investment services based on the client's individual goals and circumstances. EagleView manages client portfolios which typically consist of no load (or load waived) open-end mutual funds and/or exchange traded products, but which may also include other securities including but not limited to stocks (common and preferred), bonds (convertible, high-yield, government, corporate, collateralized, and other), and notes or bills issued by the United States Treasury. EagleView also assists clients with the selection of other independent investment advisers for the management of additional securities portfolios. Our advice is limited to these types of investments.

Investment Portfolios

EagleView manages client portfolios primarily consisting of mutual funds or exchange traded products based on the individual needs and goals of the client. EagleView will also recommend stocks and bonds for management portfolios, as appropriate. (EagleView may offer investment advice on any investments held by a client at the start of the advisory relationship.) Through personal discussions in which goals and objectives based on a client's particular circumstances are established, EagleView develops a client's personal investment policy and determines with the client an appropriate risk tolerance model. Once the appropriate model has been determined,

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EagleView will manage the client's assets on a continuous basis within the parameters of the model.

As necessary, EagleView will also rebalance the portfolio on a quarterly basis, based on the portfolio's goal and each client's individual needs. Each client will have the opportunity to place reasonable restrictions on investing in certain securities or types of securities to be held in the portfolio.

Clients should notify EagleView in writing with respect to changes in the client risk tolerance, investment objectives, and/or any significant tax, financial or other changes which may impact EagleView management of the client portfolio.

EagleView also offers advice with respect to equity securities (Including exchange-listed securities and securities traded over-the-counter), corporate debt securities (other than commercial paper), certificates of deposit, municipal securities, investment company securities (Including variable life insurance, variable annuities, and mutual fund shares), and United States governmental securities.

Pension Planning Services

EagleView also offers several advisory services separately or in combination to pension, profit sharing and 401(k) plans. EagleView will prepare written investment policy statements (IPS) stating needs and goals and encompassing a policy under which these goals are to be achieved. The IPS will also list the criteria for selection of investment vehicles and the procedures and timing interval for monitoring of investment performance. EagleView will review various investments, generally consisting of mutual funds (both index and actively managed) to determine which of these investments are appropriate to implement the client's IPS. The number of investments to be recommended will be determined by the client, based on the Investment Policy Statement.

For pension, profit sharing and 401(k) plan clients wherein there are individual accounts with participants exercising control over assets in their own account ("self-directed plans"), EagleView also provides quarterly educational support and investment workshops designed for the Plan participants. The nature of the topics to be covered will be determined by EagleView and the client under the guidelines established by ERISA.

Financial Planning

EagleView also provides advice in the form of a personal financial plan. Clients purchasing this service will receive a written report, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern:

- Personal: Family records, budgeting, personal liability, estate information and financial goals.

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- Tax & Cash Flow: Income tax and spending analysis and planning for past, current and future years. EagleView will illustrate the impact of various investments on a client's current Income tax and future tax liability.
- Death & Disability: Cash needs at death, Income needs of surviving dependents, estate planning and disability Income analysis.
- Retirement: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.
- Investments: Analysis of investment alternatives and their effect on a client's portfolio.
- Business Succession and Wealth Transfer: Analysis of investment vehicles, trusts, and other methods estate tax minimization techniques.

EagleView gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should a client choose to implement the recommendations contained in the plan, EagleView suggests the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

Services Limited to Specific Types of Investments

EagleView limits its investment advice and/or money management to mutual funds, equities, bonds, fixed Income, debt securities, ETPs, real estate, hedge funds, third party money managers, REITs, private placements and government securities. EagleView may use other securities as well to help diversify a portfolio when applicable.

Consulting Services

EagleView also offers consulting services in which they would act as a liaison between the client and their money manager and other assets. The client would specify which assets the consultant would be responsible to provide advice. On a regular basis, the Consultant would offer the client advice and opinions concerning:

- Asset Allocation
- Asset Class and Security Duplication
- Integrate Client's disparate investment Portfolios
- Review Manager Fees, Turnover, and Transaction Costs
- Create or Review Investment Policy Statement

This list is representative. Actual services would be determined, and defined, at the time the account is opened. The Investment Consultant would have neither custody nor investment

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discretion of the assets. The Investment Consultant's responsibility is to provide advice and opinion to the client.

EagleView also offers ongoing consulting services to pension or other employee benefit plans (Including but not limited to 401(k) plans) based on the demographics, goals, objectives, time horizon, and/or risk tolerance of the plan's participants.

Wrap Fee Programs

EagleView does not participate in wrap fee programs by providing portfolio management services.

Assets under Management

As of December 31, 2013, EagleView managed \$318,247,217 on a discretionary basis, for a total of \$318,247,217.

Item 5: Fees and Compensation

Compensation for Advisory Services

The annual fee for investment services will be charged as a percentage of total client assets managed by EagleView. The basic fee schedule is the following:

Assets under Management	Annual Fee (%)
\$1 - \$1,000,000	2.00%
\$1,000,001 - \$5,000,000	1.50%
\$5,000,001 and Above	1.00%

These fees are negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract.

Consulting Service Fees

Assets under Management	Annual Fee (%)
\$1 - \$1,000,000	0.45%
\$1,000,001 - \$5,000,000	0.30%
\$5,000,001 and Above	0.20%

These fees are negotiable depending on the needs of the client and complexity of the situation. The Investment Consulting fee schedule is shown above. Fees are paid monthly in arrears, and clients may terminate their contracts with 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. Consulting Service fees are withdrawn directly from the client's accounts with client written authorization.

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Method of Fee Payment

Payment of Investment Supervisory Fees

EagleView currently offers two methods of fee payment for Investment Supervisory fees:

Monthly in Arrears

Fees are paid monthly in arrears, and clients may terminate their contracts within sixty 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 written authorization.

Quarterly in Advance

EagleView invoices clients in advance at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance), of the client's account at the end of the previous quarter.

Payment of Consulting Service Fees

Consulting Service fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid monthly in arrears. Advisory fees may also be invoiced and billed directly to the client monthly in arrears, and due on the 15th of the month following the month charged. Clients may select the method in which they are billed.

Separate Mutual Fund Fees

All fees paid to EagleView for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in a mutual fund directly, without the services of EagleView. In that case, the client would not receive the services provided by EagleView which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by EagleView to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Short Term Trading Fees: EagleView may utilize funds which have short term redemption fees imposed by the fund family; custodians may also charge such fees for shares held less than 90 days. In managing client assets, EagleView attempts to minimize or avoid such fees whenever possible. However, circumstances may make it necessary to incur such charges.

Financial Planning Fees

Financial planning fees will be charged in one of two ways:

1. On an hourly basis, at a rate of \$150 per hour. An estimate for total hours will be determined at the start of the advisory relationship, however, the total fee will be based on actual hours; or
2. As a fixed fee, based on the services requested by the client.

50% of any estimated or fixed fee may be due upon signing the advisory agreement, with the balance due upon presentation of the plan to the client.

Typically, a financial plan will be presented to the client within 90 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the client.

Brokerage Fees

Clients will incur commissions, markup/mark downs, and other transaction-related or asset based fees for securities trades that are executed through the respective broker-dealers or that settle into accounts at the respective broker-dealers. Clients are responsible for the payment of all third party fees (i.e., custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by EagleView. Please see Item 12 of this brochure regarding broker/custodian for more information.

Fees at Termination

A client agreement may be cancelled at any time, by either party, for any reason upon receipt of 60 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

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

Neither EagleView nor its supervised persons accept performance-based fees. (Such fees are based on a share of capital gains on capital appreciation of the assets of a client.)

Item 7: Types of Clients

The types of clients to whom EagleView generally provides investment advice include individuals, high net worth individuals, institutions, pension and profit sharing plans, investment companies (including mutual funds), charitable organizations, and corporations or other business.

EagleView's minimum account size is \$25,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

A. Methods of Analysis and Investment Strategies

EagleView's methods of analysis include charting analysis, fundamental analysis, and technical analysis.

Charting analysis involves the use of patterns in performance charts. EagleView uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

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

EagleView uses long term trading 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

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

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 generally hold greater risk and clients should be aware that there is a chance of 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

EagleView generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

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

There are no legal or disciplinary events that are materials to a client's or prospective client's evaluation of EagleView advisory business or the integrity of it management.

Item 10: Other Financial Industry Activities and Affiliations

Brokerage Services

Officers and associated persons of EagleView are also officers and registered representatives of EagleView Securities, Inc. ("EVS"), a FINRA member broker under common control with EagleView. EVS also shares office space with EagleView.

Officers and associated persons of EagleView are also officers and registered representatives of First Savings Securities, Inc. a FINRA member broker under common control with EagleView. EVS also shares office space with EagleView.

Marc Frederick Zarro is a registered representative with Sunbelt Securities, Inc. From time to time, he will offer clients advice or products from those activities.

Clients may engage EVS, at their discretion, to implement certain securities transactions for which EVS and its representatives will receive commission compensation. EVS's services are not utilized for the management of investment advisory portfolios described above, or pension planning services. However, EagleView may make advisory recommendations that Include financial planning or other investment goals that may be implemented through securities transactions with EVS rather than as part of an investment management accounts with EagleView.

Clients are under no obligation to engage affiliated companies when implementation of financial planning or other advisory recommendations. The implementation of such all recommendations

is solely at the discretion of the client. While EagleView and its advisory representatives endeavor at all times to put the interest of the clients first as part of EagleView's fiduciary duty, clients should be aware that the receipt of compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

Insurance and Pension Services

EagleView is also licensed to receive insurance commissions in the State of Pennsylvania and a number of other states, provides business planning and tax services, and acts as a third party pension administrative service provider. Some of the same employees provide EagleView's advisory services, insurance services and third party pension administrative services. EagleView's services may also include estate planning, and succession planning for businesses.

In providing various services to clients, however, EagleView and its affiliated persons have an incentive to recommend the various services to clients and their judgment may be influenced. The various services, in some instances, are closely related. Clients, however, are under no obligation to act upon any recommendations made by EagleView or its affiliated persons regarding the use of each various service.

EagleView may receive 12b-1 fees on certain pension plan assets to which it provides services. Please see Item 14 (Client Referrals and Other Compensation) below describing fee offset procedures regarding 12b-1 fees.

Banking Services

EagleView is a directly owned as a wholly owned subsidiary of First Savings Bank, Perkasi, PA, a Pennsylvania chartered stock savings bank (the "Bank"). Fred Schea, the President of EagleView, spends a majority of his time in his duties with respect to the Bank. Clients of EagleView may hold accounts at the Bank, but those are not managed by EagleView. With the exception of Mr. Schea, neither EagleView nor any of its officers or employees directly or indirectly hold client funds or securities held in such accounts, have any authority to obtain possession of client funds or securities held in such accounts, or any authority to appropriate such funds or securities. Mr. Schea (acting as an officer of the Bank), and the directors of EagleView may so hold or have such authorities, but only in the normal course of their individual capacities as directors, officers, and/or employees of the Bank, or because in their respective individual capacities they are the client or are so connected to the client, i.e. as executor for an estate of a family member which holds an account at the Bank.

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

Code of Ethics

EagleView has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. EagleView's Code of Ethics covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities,

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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.

EagleView's Code of Ethics further includes the firm's policy prohibiting the use of material non- public information. While EagleView does not believe that it has any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity. EagleView is not affiliated with an investment company or other publicly traded security.

To supervise compliance with its Code of Ethics, EagleView requires access persons to provide annual securities holdings reports and quarterly transaction reports to the firm's Chief Compliance Officer. While mutual fund shares are not required to be reportable securities under the applicable federal rules, EagleView requires the full reporting of securities transactions by access persons in these investments based on EagleView's business practices.

EagleView requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to termination.

EagleView will provide a copy of the EagleView Code of Ethics to any client or prospective client upon request.

Recommendations Where EagleView/Related Persons Have a Material Financial Interest

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

Recommendations Where EagleView/Related Persons Are Also Invested

From time to time, representatives of EagleView may buy or sell securities for themselves that they also recommend to clients. EagleView 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.

Transactions/Recommendations Where EagleView/Related Persons Transact

From time to time, representatives of EagleView may buy or sell securities for themselves at or around the same time as clients. EagleView will trade client's non-mutual funds and non-ETF before they trade their own.

Item 12: Brokerage Practices

The Custodians and Brokers We Use

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EagleView (“we”/“our”) does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We require that our clients use one of four broker-dealers - Charles Schwab & Co., Inc. (“Schwab”), Fidelity Brokerage Services, Inc. (“Fidelity”), FOLIO Institutional (“Folio”) and TD Ameritrade Investor Services, Inc. (“TDA”), each of which is a registered broker-dealer, member SIPC - as the qualified custodian. (These four broker-dealers are referred to below individually as a “custodian” and collectively as “custodians.”) A custodian will hold your assets in a brokerage account and buy and sell securities when we instruct them to. These custodians provide EagleView with access to their institutional trading and custody services, which are necessary for EagleView's management of investment portfolios and which are typically not available to retail investors.

We are independently owned and operated and are not affiliated with any custodian.

While we require that you use one of the three above-mentioned firms as custodian, you will decide whether to do so and will open your account with the custodian of your choice by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients to use particular broker-dealers or other custodians from a group selected by the advisor. Even though your account is maintained at a particular custodian, we can still use other brokers to execute trades for your account as described below (see “*Your Brokerage and Custody Costs*”).

How We Select Brokers/Custodians

We seek to recommend a custodian which will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, Including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (“ETFs”), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see “*Products and Services Available to Us From Custodians*”)

Your Brokerage and Custody Costs

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For our clients' accounts maintained at a custodian, the custodian generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your account at the custodian. (For example, transaction fees are charged for certain no-load mutual funds, and commissions are charged for individual equity and debt securities transactions. Each custodian also provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.) For some accounts, typically separately managed accounts, a custodian may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. A Custodian's commission rates and asset-based fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least a specified Aggregate Account Value in accounts at the custodian. This commitment benefits you because the overall commission rates and asset-based fees you pay are lower than they would be otherwise. In addition to commissions and asset-based fees, each custodian charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that that custodian has executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your account at the custodian. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have each custodian execute most trades for your account at that same custodian. We have determined that having your custodian execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see *"How We Select Brokers/Custodians"*).

As EagleView does not have the discretionary authority to determine the custodian to be used or the commission rates to be paid, clients must direct EagleView as to the custodian to be used. Directing brokerage may cost clients more money. Because the client directs the use of a particular broker, EagleView may be unable to achieve most favorable execution of client transactions. For example, in a directed brokerage account, the client may pay higher brokerage commissions because EagleView may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices. It should be understood that EagleView will not have authority to negotiate commissions among various brokers. A disparity in commission charges may exist between the commissions charged to other clients.

EagleView has established prime brokerage account relationships through Schwab, Fidelity, and TDA through which it may purchase fixed Income products directly from third parties and maintain custody at Schwab, Fidelity, or TDA. In this situation, EagleView will seek to select those brokers or dealers which will provide the best services at the lowest commission rates possible. The reasonableness of brokerage costs, commissions and mark ups/mark downs is based on the broker dealer's ability to provide professional services, competitive execution, and other services that will help EagleView in providing investment management services to clients.

For such fixed Income portfolios and transactions, EagleView may request that it be provided with written authority to determine the broker dealer to use for client transactions and the costs that will be incurred by clients for these transactions. Any limitations on this discretionary authority shall be Included in this written authority statement. Clients may change/amend these

limitations as required. Such amendments shall be submitted in writing.

Products and Services Available to Us from Custodians

EagleView participates in Schwab's Schwab Advisor Services™ (formerly called Schwab Institutional®) services program, and TDA's services program. EagleView has an arrangement with National Financial Services Inc. and Fidelity Brokerage Services Inc. (collectively, and together with all affiliates, "Fidelity") through which Fidelity provides EagleView with institutional platform services through its services program. Below these three programs are referred to collectively as the "Institutional Services Programs".

Such programs serve independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to retail customers. Each custodian also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Each custodian's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our clients collectively maintain a certain minimum total of client assets in accounts at the particular custodian (the "Aggregate Account Value"). (The Aggregate Account Values are as follows: Schwab (\$10,000,000), Fidelity (\$25,000,000) and TDA (\$25,000,000). If our clients collectively have less than the Aggregate Account Value in assets at a particular custodian, that custodian may charge us quarterly service fees. Following is a more detailed description of custodian support services:

Services That Benefit You

Each custodian's institutional brokerage services Include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through a custodian include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. A custodian's services described in this paragraph generally benefit you and your account. With respect to mutual funds listed on a particular custodian's platform, the custodian may receive some or all of the 12b-1 fee and/or other fees from the mutual fund as payment for being listed on and set up on the custodian's trading platform.

Services That May Not Directly Benefit You

Each custodian also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They Include investment research, both the custodian's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at the same custodian. In addition to investment research, each custodian also makes available software and other technology that:

Provide access to client account data (such as duplicate trade confirmations and account statements)

- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide research, pricing information, and other market data

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- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us

Each custodian also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Access to bundled duplicate statements;
- Educational conferences, roundtables, webinars and other events;
- Consulting on technology, compliance, legal, and business needs Including but not limited to performance reporting, financial planning, contact management systems
- Publications and conferences on practice management, information technology, marketing, compliance and business succession
- Access to consultants, employee benefits providers, human capital consultants, and insurance providers, third party research

Each custodian may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. A custodian may also simply provide access to such third-party vendors with whom EagleView may contract directly. A custodian may discount or waive its fees for some of these services or pay all or a part of a third party's fees. A custodian may also provide us with other benefits, such as occasional business entertainment of our personnel.

Aside from Incidental seasonal gifts, typically totaling less than \$100 per year from any one broker-dealer, no individual associated with EagleView personally benefits from any of the above mentioned products or services.

Our Interest in A Custodian's Services

While there is no direct linkage between the investment advice given and participation in any particular Institutional Services Program, economic benefits are received which would not be received if EagleView did not give investment advice to clients. These benefit EagleView but may not directly benefit its clients' accounts.

The availability of these services from the custodians benefits us because we do not have to produce or purchase them. We don't have to pay for such services from a particular custodian so long as our clients collectively keep a total of at least the Aggregate Account Value of their assets in accounts at that custodian. Beyond that, these services are not contingent upon us committing any specific amount of business to a particular custodian in trading commissions or assets in custody. The Aggregate Account Value minimum may give us an Incentive to recommend that you maintain your account with a particular custodian, based on our interest in receiving that particular custodian's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of a particular firm as custodian and broker is in the best interests of our clients. Our selection is

primarily supported by the scope, quality, and price of each custodian's services (see "*How We Select Brokers/Custodians*") and not that custodian's services that benefit only us. Since we have well over \$100,000,000 in client assets under management, we do not believe that recommending our clients to collectively maintain at least the Aggregate Account Value of those assets at a particular custodian in order to avoid paying a custodian's quarterly service fees presents a material conflict of interest.

Financial Planning

As disclosed above, EagleView may recommend EVS and its affiliated persons for the implementation of certain financial planning or other advisory recommendations.

Brokerage for Client Referrals

EagleView does not consider, in selecting or recommending broker-dealers, whether EagleView or a related person receives client referrals from a particular broker-dealer or third party.

EagleView participates in the Fidelity Wealth Advisor Solutions program. Wealth Advisor Solutions is a referral program designed to introduce high net worth investors to independent registered investment advisors. EagleView does not pay a fee to participate in the Wealth Advisor Solutions Program. EagleView participation in the program may raise potential conflicts of interest. EagleView may have an Incentive to recommend that clients custody asset with Fidelity.

Aggregating Orders

Client trades in equities and fixed Income securities may be blocked with transactions for other advisory clients to achieve better pricing and commission costs. Partially filled orders will be allocated on a pro-rata basis. In the event that a pro-rata bond allocation is not possible, allocation will be made in a fair and reasonable manner among clients, generally as follows: (A) First calculate a pro-rata allocation. (B) Knock out of the allocation those clients whose need for a bond investment is less than five bonds. (C) Reallocate the bonds that are unallocated as a result of (B), assigning them first to clients who would otherwise receive less than five bonds, then pro-rata among all remaining clients in the allocation.

Item 13: Review of Accounts

Periodic Reviews

EagleView's Chief Investment Officer is responsible for the daily supervision of all investment management accounts. The President of EagleView supervises all advisory services. Certain representatives of EagleView may primarily provide financial planning or pension plan support services.

Portfolios within EagleView's Investment Services receive ongoing reviews based on market and economic conditions, political circumstances and the client's personal financial

**Not FDIC Insured/May Lose Value/No Bank Guarantee
Not a Deposit/Not Insured by Any Federal Government Entity**

circumstances. Formal account reviews are performed quarterly, at which time clients will receive written reports describing portfolio holdings and asset allocations. Clients will also receive statements from their account custodian.

Financial Planning

Financial planning reviews and reports are provided based on the topics requested by the client for review. Planning services are a one-time service, rather than an ongoing service. Clients may, however, contract with EagleView for specific periodic reviews of financial plans.

Pension Accounts

Client investments will be monitored periodically based on the procedures and timing intervals delineated in the Investment Policy Statement. EagleView will supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate. Plan participants may select an investment model managed by EagleView for management on their individual contributions.

See also Item 4 (Advisory Business) above.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to EagleView by a Non-Client

We receive an economic benefit from each custodian in the form of the support products and services the custodian makes available to us and other independent investment advisors whose clients maintain their accounts at the custodian.

These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of a particular custodian's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

EagleView may receive 12b-1 fees directly from investment companies in connection with the placement of certain pension plan assets into investment companies. Any such fees received by EagleView related to a client's pension plan will be used to offset advisory fees charged by EagleView for services to that plan.

Referral Compensation Paid to Third Parties

EagleView may engage CPAs or other professionals to provide EagleView with client referrals. Through the referring party, any compensation paid by EagleView to the referring party will be disclosed to the client. EagleView may negotiate with a referring party a flat fee or a percentage-based fee that will be paid to the referring party each quarter in which the referred client remains a client of EagleView. Advisory representatives of EagleView may also be

compensated based on their solicitation of client relationships.

Item 15: Custody

Clients will receive account statements from the broker-dealer, bank or other qualified custodian which holds the client account. Clients should carefully review those statements. EagleView urges clients to compare those statements with the separate statements received from EagleView.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct a custodian to deduct our advisory fees directly from your account. The custodian maintains actual custody of your assets. You will receive account statements directly from the custodian at least quarterly. They will be sent to the email or postal mailing address you provided to the custodian. You should carefully review those statements promptly when you receive them. We also urge you to compare the custodian's account statements to the periodic portfolio reports you will receive from us.

Item 16: Investment Discretion

EagleView accepts discretionary authority to manage securities accounts on behalf of clients.

The client grants this authority by signing a contract with EagleView for management of investment portfolios. This allows EagleView to determine, without obtaining specific client consent, which securities to buy and sell, and the amounts of securities to buy or sell. Clients customarily do not place limits on this authority, but may do so by signing a written amendment to the contract. The amendment takes effect when EagleView signs that amendment.

Item 17: Voting Client Securities

As part of its Investment Management Services, EagleView will generally not accept discretion from clients to vote proxies on their behalf.

Item 18: Financial Information

EagleView does not require or solicit prepayment of fees six months or more in advance. There are no financial conditions that are reasonably likely to impair EagleView's ability to meet contractual obligations to clients.

Item 19: Requirements for State-Registered Advisers

As an SEC registered investment advisor, EagleView is not registered with any state securities authority, so this disclosure item is not applicable to the firm.