

Item 1 – Cover Page

VIEWPOINT ADVISORY, LLC

22722 29th Dr SE, Suite 100
Bothell, WA 98021

August 22, 2019

viewpointadvisory.com

This Brochure provides information about the qualifications and business practices of Viewpoint Advisory, LLC. If you have any questions about the contents of this Brochure, please contact us at 206-604-4099 or kimmiller1@hotmail.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about Viewpoint Advisory, LLC is available on the SEC’s website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Viewpoint Advisory, LLC is 305164.

Item 2 – Material Changes

This is our initial brochure. There are no material changes.

We will ensure that all current clients receive a Summary of Material Changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. A Summary of Material Changes is also included with our Brochure on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Viewpoint Advisory, LLC is 305164. We may further provide other ongoing disclosure information about material changes as necessary and will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Kim Miller, Chief Compliance Officer of Viewpoint Advisory, LLC at 206-604-4099 or kimmiller1@hotmail.com. Our Brochure is provided free of charge.

Item 3 – Table of Contents

	<u>Page</u>
Item 1 – Cover Page.....	i
Item 2 – Material Changes.....	ii
Item 3 – Table of Contents	iii
Item 4 – Advisory Business.....	1
Item 5 – Fees and Compensation.....	2
Item 6 – Performance-Based Fees and Side-By-Side Management	3
Item 7 – Types of Clients.....	4
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	5
Item 9 – Disciplinary Information.....	6
Item 10 – Other Financial Industry Activities and Affiliations	7
Item 11 – Code of Ethics, Participation or Interest in Client Transaction & Personal Trading	8
Item 12 – Brokerage Practices	9
Item 13 – Review of Accounts.....	10
Item 14 – Client Referrals and Other Compensation	11
Item 15 – Custody.....	12
Item 16 – Investment Discretion	13
Item 17 – Voting Client Securities.....	14
Item 18 – Financial Information.....	15

Item 4 – Advisory Business

A Viewpoint Advisory, LLC (“Viewpoint” “we” or “us”) is a registered investment advisor located in Bothell, Washington and registered with the Securities and Exchange Commission. Viewpoint’s founder and owner is Kim Miller.

B & C Viewpoint provides fee-only discretionary portfolio management services to a variety of investors, including individuals, high net worth individuals, trusts, and retirement plans. Services include but are not limited to investment strategy, risk tolerance, asset selection & allocation, rebalancing, generating income streams. Customized portfolio management services are based on the individual needs, goals, objectives, time horizon and risk tolerance of each client.

We also provide financial planning for our Clients on matters not involving securities. Planning includes gathering all information necessary to provide clients with any of the appropriate services: retirement and future goal planning, budgeting and cash flow planning, disability and long-term care planning, income protection, debt management, estate planning, and investment planning. The plan considers all Client assets, liabilities, goals and objectives.

Educational workshops may be offered to clients as part of our service.

See Item 8 for a description of our investment strategy.

D Viewpoint does not offer a Wrap Fee program.

E We manage \$0 of Client assets on a discretionary basis and \$0 of Client assets on a non-discretionary basis. This amount was calculated as of July 31, 2019

Item 5 – Fees and Compensation

A Viewpoint charges annual fees for managing Clients' portfolios. The fees charged generally vary between 0.3% and 0.9% of assets under management according to the amount of assets under management, and generally are not negotiable. Viewpoint does offer a discount to employees and family members. Viewpoint has an account balance minimum of \$250,000. We will make exceptions to this minimum under certain circumstances. Certain projects may also be billed on a fixed or hourly fee.

B We bill Client quarterly, in advance. Fees are paid directly to us from the account by the custodian upon our submission of an invoice to custodian. Payment of fees may result in the liquidation of Client's securities if there is insufficient cash in the account. The fee is based on the balance of the account on the last day of the preceding quarter.

For fixed fee projects 50% of the fixed fee shall be billed prior to beginning work, with the balance due upon completion of the project.

C Clients pay brokerage transaction costs and other charges directly to the custodian. See Item 12 – Brokerage Practices. Clients may be required to pay, in addition to Viewpoint's fee, a proportionate share of any exchange traded fund's or mutual fund's fees and charges. For example, Mutual fund operating expenses are paid out of the fund and are an additional expense incurred by the Client.

D Clients pay all advisory fees quarterly in advance. New accounts are pro-rated from the time we begin charging a fee to the Client. Fees for partial months at the commencement or termination of this Agreement will be billed on a pro-rated basis contingent on the number of days the account was open during the month. Additionally, all service agreements may be terminated at any time by providing us with 15 days written notice. Any compensation paid for services beyond the time the agreement was terminated in writing will be refunded to the Client.

If Viewpoint has provided the Client a copy of its Form ADV Part 2 less than forty-eight hours prior to entering into any investment advisory contract or if Viewpoint provided the Client a copy of its Form ADV Part 2 at the time of entering into the investment advisory agreement, then the Client may terminate the investment advisory agreement without penalty within five business days after entering into the contract. Alternatively, the investment advisory agreement may be terminated at any time by either party by providing 15 days written notice to the other party.

E Viewpoint does not accept compensation for the sale of securities or other investment products.

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

Viewpoint does not charge any performance-based fees for its services or perform side by side management. Accordingly, this item is not applicable to our firm.

Item 7 – Types of Clients

We provide investment advice to individuals, high net worth individuals, trusts, and retirement plans. Because each Client is unique, they must be willing to be involved in the planning and ongoing processes. Such involvement does not have to be time consuming, however we want our Clients to remain informed and have a sense of security about their investments. Viewpoint has an asset minimum of \$250,000 to open an account. We will make exceptions to this minimum under certain circumstances.

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

A Our Methods of Analysis and Investment Strategies

Viewpoint’s services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory and is firmly rooted in the belief that markets are “efficient” and that investor returns are determined principally by asset allocation decisions, rather than market timing or stock picking.

Viewpoint recommends diversified portfolios, primarily through the use of non-predictive managed, asset class mutual funds. Viewpoint may also periodically use Exchange Traded Funds (ETFs) to represent an asset class. Although all investments involve risk, Viewpoint’s investment recommendations seek to limit risk through broad diversification in global equity classes and as appropriate for each client, an allocation to conservative fixed income securities for the fixed income class. Viewpoint’s investment philosophy is designed for investors who desire a buy and hold strategy, with five and even ten or more years of equity-investing time horizon.

B We use our best judgment and good faith efforts in rendering services to Client. We cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Not every investment recommendation we make will be profitable. Investing in securities involves risk of loss that Clients should be prepared to bear. Clients assume all market risk involved in the investment of account assets. Investments are subject to various market, currency, economic, political, and business risks.

Except as may otherwise be provided by law, we are not liable to Clients for:

- any loss that Clients may suffer by reason of any investment recommendation we made with that degree of care, skill, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; or
- any independent act or failure to act by a custodian of Client accounts.

It is the responsibility of the Client to give us complete information and to notify us of any changes in financial circumstances, risk tolerance or goals.

C While all investing involves risks of loss, our advisory services generally recommend a broad and diversified use of equities, mutual funds, and fixed income which does not involve significant or unusual risks because of our broad allocation.

Item 9 – Disciplinary Information

Viewpoint is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our firm, or the integrity of our management. No principal or person associated with Viewpoint has any information to disclose which is applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

No relevant other financial industry affiliations are applicable. While Kim Miller is a licensed insurance agent, she does not write policies.

Item 11 – Code of Ethics, Participation or Interest in Client Transaction & Personal Trading

- A** Viewpoint has a Code of Ethics which all employees are required to follow. The Code of Ethics outlines our high standard of business conduct, and fiduciary duty to Clients. The Code of Ethics includes provisions relating to the confidentiality of Client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things.

A copy of the code of ethics is available to any Client or prospective Client upon request by contacting Kim Miller, Chief Compliance Officer of Viewpoint at 206-604-4099 or kimmiller1@hotmail.com

- B, C, D** We do not own or manage any companies or investments that we advise our Clients to buy.

Viewpoint or individuals associated with our firm may buy and sell some of the same securities for their own account that Viewpoint buys and sells for its Clients. When appropriate, we will purchase or sell securities for Clients before purchasing the same for our account or allowing representatives to purchase or sell the same for their own account. In some cases, Viewpoint or representatives may buy or sell securities for their own account for reasons not related to the strategies adopted for our Clients. Our employees are required to follow the Code of Ethics when making trades for their own accounts in securities which are recommended to and/or purchased for Clients. The Code of Ethics is designed to assure that the personal securities transactions will not interfere with decisions made in the best interest of advisory Clients while at the same time, allowing employees to invest their own accounts.

Viewpoint will disclose to advisory Clients any material conflict of interest relating to us, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

As any advisory situation could present a conflict of interest, we have established the following restrictions to ensure our fiduciary responsibilities. First, no employee of Viewpoint shall not buy or sell securities for his or her personal portfolio where the decision is substantially derived, in whole or in part, by reason of his employment unless the information is also available to the investing public on reasonable inquiry. No person of Viewpoint shall prefer his or her own interest to that of the advisory Client. Additionally, an appropriate officer of Viewpoint reviews holdings of the Advisor and its associated persons on a regular basis.

Item 12 – Brokerage Practices

A Our Clients' assets are held by independent third-party custodians. Except to the extent that the Client directs otherwise, Viewpoint may use its discretion in selecting or recommending the broker-dealer. The Client is not obligated to effect transactions through any broker-dealer recommended by Viewpoint. In recommending broker-dealers, Viewpoint will comply with its fiduciary duty to seek best execution and with the Securities Exchange Act of 1934 and will take into account such relevant factors as:

- Price;
- The custodian's facilities, reliability and financial responsibility;
- The ability of the custodian to effect transactions, particularly with regard to such aspects as timing, order size and execution of order; and
- Any other factors that we consider to be relevant.

We will recommend that Clients establish brokerage accounts with Charles Schwab and Co., Inc. ("Schwab"), so long as Schwab continues to meet the above criteria. We work primarily with Schwab for administrative convenience and also because Schwab offers a good value to our Clients for the transaction costs and other costs incurred.

B Viewpoint does not aggregate trades for Clients.

Item 13 – Review of Accounts

- A** Accounts are reviewed by Kim Miller who is responsible for overseeing all investment advisory activities for the firm. The frequency of reviews is determined based on the Client's investment objectives. Accounts are generally reviewed quarterly, but in any event, no less than annually.
- B** More frequent reviews may be triggered by a change in Client's investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in the economic climate.
- C** Investment advisory Clients receive standard account statements from the custodian of their accounts on a quarterly basis. Viewpoint also provides Clients with a written report summarizing the account activity generally quarterly, but in any event, no less than annually.

Item 14 – Client Referrals and Other Compensation

Viewpoint neither compensates, nor receives compensation from, any third parties in connection with client referrals.

Item 15 – Custody

With the exception of Viewpoint’s ability to debit fees, Viewpoint does not otherwise have custody of the assets in the account. Clients provide written authority to have fees debited from their accounts when they review and sign Viewpoint’s Investment Advisory Agreement. They also provide the Custodian the authority to release fee payments from their accounts when they sign the custodial account application. Clients shall receive account statements quarterly from the Custodian. Clients also receive quarterly statements from Viewpoint that include notification of advisory fee calculations and the debiting from of these fees from client accounts. We urge clients to review the Viewpoint statements carefully and compare these accounts statements with the account statements from the Custodian. Please note that Viewpoint reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Viewpoint shall have no liability to the Client for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation (“SIPC”) or any other insurance which may be carried by the custodian. The Client understands that SIPC provides only limited protection for the loss of property held by a custodian.

Item 16 – Investment Discretion

Clients grant Viewpoint ongoing and continuous discretionary authority to execute its investment recommendations in accordance with Viewpoint's Statement of Investment Policy (or similar document used to establish each Client's objectives and suitability), without the Client's prior approval of each specific transaction. Under this discretionary authority, Client allows Viewpoint to purchase and sell securities and instruments in their account(s), arrange for delivery and payment in connection with the foregoing, select and retain sub-advisors, and act on behalf of the Client in matters necessary or incidental to the handling of the account, including monitoring certain assets.

Clients may also grant certain limitations regarding investment recommendations. These limitations must be discussed in advance and written into the client's advisory agreement or investment policy statement.

Item 17 – Voting Client Securities

- A** Viewpoint will not vote proxies on behalf of Clients and will not provide advice to Clients on how the Client should vote.
- B** Viewpoint does not accept authority to vote Client securities. Most Clients will receive proxies and other solicitations directly from the custodian or transfer agent. If any proxy materials are received on behalf of a Client, they will be sent directly to the Client or a designated representative of the Client, who is responsible to vote the proxy.

Item 18 – Financial Information

- A** Viewpoint does not require or solicit prepayment of more than \$500/\$1,200 in fees per client, six months or more in advance.
- B** Viewpoint does have discretionary authority over some Client funds and securities, but we have no financial commitments that would impair our ability to meet contractual and fiduciary commitments to Clients.
- C** Neither Viewpoint, nor any of the principals, have been the subject of a bankruptcy petition at any time in the past.