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RIA Advisors
11750 Katy Freeway
Suite 840
Houston, TX 77079

Find us on the web at: <https://riaadvisors.com/>

For information contact us:

By Phone: 281-501-1791
By Facsimile: 281-501-1806
By e-mail: connie@riaadvisors.com

This Wrap Brochure (Appendix 1 of Form ADV Part 2A) is dated September 1, 2019.

Clarity Financial, LLC (hereinafter referred to as “RIA Advisors”, the “Advisor”, “our”, and/or “we”) is registered with the Securities and Exchange Commission (“SEC”) as an investment advisor doing business as RIA Advisors. Registration of an investment advisor does not signify or imply any level of skill or training.

This brochure provides information about the qualifications and business practices of RIA Advisors. If you have any questions about the contents of this brochure, please contact us at 281-501-1791 or connie@riaadvisors.com. The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about RIA Advisors also is available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2 - MATERIAL CHANGES

Please note that this Wrap Brochure has been prepared according to SEC requirements and rules and describes the advisory wrap services provided by us pursuant to this wrap brochure.

We 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 Connie Mack, Managing Member and CCO, at 281-501-1791 or connie@riaadvisors.com.

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ITEM 4 – SERVICES, FEES AND COMPENSATION

RIA Advisors has operated as an investment adviser since 2009. Currently RIA Advisors employs three Registered Advisor Representatives who operate in one office located in Houston, Texas. As of December 31, 2018, RIA Advisors had \$759,559,425 in client assets under management.

RIA Advisors is owned by Connie Mack.

Wrap Program

RIA Advisors sponsors a wrap fee program (“Wrap Program”). We manage our wrap fee accounts using the same investment process for all of our managed wrap accounts. To this end, our management of investment advisory accounts in our Wrap Program includes:

- A) Determining what your current financial situation is and what you want to accomplish with your investments over time;
- B) Developing a plan that is tailored to your situation;
- C) Buying and selling investments on your behalf to accomplish the life goals you have.

Fees and Compensation

Advisory Wrap Fee

For asset management of your account, RIA Advisors is compensated by annualized asset-based “wrap fee” (the “Advisory Wrap Fee”). The Advisory Fee charged by RIA Advisors is all-inclusive, and as such, is exclusive of all transaction fees and commissions generally incurred with respect to financial transactions by the Client (see also “*Transaction Costs*”). Although many fees are individually negotiated, the Advisory Wrap Fees paid to RIA Advisors are asset based, and are generally computed quarterly, are asset-based and based upon the maximum percentages set forth below (which Advisory Fee Wrap schedule is effective as of September 1, 2019:

Net Asset Value	Annualized Fee
\$0.00 - \$250,000	1.65%
\$250,001 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.35%
\$1,000,001 - \$2,000,000	1.10%
\$2,000,001 +	0.85%

All fees are subject to negotiation. The amounts and specific manner in which fees are charged is negotiated and memorialized in the advisory contract between RIA Advisors and our clients.

Fees are calculated by multiplying the assets under management by the relevant percent and dividing such product by 365 days then multiplying product by days contained within current quarter. Accounts opened in mid-quarter will be assessed a pro-rated management fee. Normally, fees are payable quarterly in advance, but the customer can negotiate the payment of fees in arrears. Fees may be deducted from client's account(s) within ten (10) days following the end of the month or quarter for which said fees will be incurred. All advisory fees are based on bundled pricing.

Any client charged a quarterly fee in advance will be given a pro-rata refund of fees, if services are terminated prior to the end of the quarter billed.

Fees are calculated on an incremental basis and are subject to change with 30 days written notice. Notwithstanding the above, based upon pre-existing relationships, assets under management and other factor relevant to an engagement, the actual fees charged can be less than those set out above.

Either party can terminate at any time by giving thirty (30) days prior written notice of such termination to the other party. If the Account is to be liquidated as the result of a termination notice, the parties understand that the process of liquidation can take up to five (5) trading days following the date RIA Advisors received the liquidation request.

Transaction Costs: Our fees are inclusive of brokerage commissions, transaction fees, and other related costs and . Under our Wrap Program, Clients pay a single fee for investment advisory services and transaction costs. Notwithstanding the above, the wrap fee does not include annual account fees or other administrative fees, such as wire fees, charged by us and or the Custodian, certain odd-lot differentials, transfer taxes, transaction fees mandated by the Securities Act of 1934, postage and handling fees, and charges imposed by law with regard to transactions in the Client's account; and advisory fees, expenses or sales charges (loads) of mutual funds (including money market funds), closed-end investment companies or other managed investments, if any, held in Client's account. The wrap fee also does not cover certain costs associated with securities transactions in the over-the-counter market, such as fixed income securities where Manager must approach a dealer or market maker to purchase or sell a security. Such costs include the dealer's mark-up, mark-down or spread and odd-lot differentials or transfer taxes imposed by law.

Other Portfolio Issues

With respect to employee and family related accounts, the quarterly advisory fees are generally less. Additionally, RIA Advisors may charge less with respect to certain client accounts, depending upon a number of factors, including portfolio size, length of employment, and relationship to the employee.

ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Account Requirements

RIA Advisors generally does not require that Clients have a minimum net worth or net assets.

Types of Clients

RIA Advisors provides advisory services to individuals, high net worth individuals, charitable organizations and to small businesses, such as sole proprietorships, partnerships, and small corporations.

Additionally, the Adviser provides investment advisory services to the following types of clients:

- Tax-qualified retirement plans (both defined benefit and defined contribution) that are intended to receive favorable tax-treatment under section 401(a) or 403(b) of the IRC
- Non-qualified executive deferred compensation plans
- Other types of retirement plan types as may be introduced to the Programs.

ITEM 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION

Third Party Manager Selection

RIA Advisors can engage the services of third-party managers as sub-managers for management of client investment portfolios. A due diligence effort to select and retain suitable managers generally takes into consideration the following:

- (i) Whether the portfolio manager is affiliated with a bank, insurance company, broker- dealer, and/or registered investment advisor;
- (ii) For active managers, to the extent utilized, historical performance calculations comply with the performance guidelines of the Global Investment Performance Standards (“GIPS”). Additionally, the performance represents the style of the portfolio being considered;
- (iii) Information obtained on key personnel, representative clients, fee arrangements, range of investment styles, and assets under management;
- (iv) Qualitative analysis that considers a clearly defined investment strategy, consideration to the investment selection process, sell discipline/downside protection, investment style adherence, quality and depth of the management team, firm ownership, desire to close portfolios based on size, marketing capabilities, type of client base, and regulatory compliance, transparency of underlying investments, and research capabilities;
- (v) Quantitative analysis which considers risk-adjusted returns, performance attribution, portfolio composition, fees, and statistical measures.

Other investment formats (direct investments, Exchange Traded Funds, index funds, commingled funds, limited partnerships, fund-of-funds, etc.) shall be examined with the same due diligence scrutiny as a traditional manager structure.

Consideration will be given to both active and passive management when available. The rationale to engage active management is to “add value” over time versus an indexed alternative. Both enhanced return and risk control are opportunities for a manager to “outperform” a comparable benchmark. Recognizing that active managers have periods where they over and underperform the benchmarks, manager selection and retention shall consider a series of full market cycles (at least 5-10 years) in order to weight the impact of active management over long periods of time.

The selection, retention or dismissal of a portfolio manager is based on a comprehensive due diligence assessment, however it is possible that a manager could be engaged even though the analysis reveals certain factors that, in isolation, could be deemed unappealing.

Related Person Portfolio Management

Our investment adviser professionals are allowed to act as an investment adviser representative for our Wrap Program. Their activities are monitored, an annual review of client and portfolio information is performed to confirm that your investment professional is acting in your best interest, and they are compensated through a comprehensive single fee.

Performance Review

We do not utilize a third-party to review portfolio performance information. Additionally, you should be aware that performance information may not be calculated on a uniform and consistent basis.

Performance-Based Fees and Side-by-Side Management

RIA Advisors does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of your portfolio assets), nor does it provide side-by-side management.

Analysis Methods

Investing in securities involves risk of loss that clients should be prepared to bear. Security analysis methods utilized by RIA Advisors include the following:

Charting

Charting analysis seeks to identify resistance and support reference prices for decisions to buy (price hits the support) or sell (price hits the resistance). Through charting, the analysis seeks to identify price patterns and market trends in financial markets. Charting may apply to long-term investing or be used as a market-timing strategy, depending on the timeframe of the price charts.

Fundamental

Fundamental analysis maintains that markets may misprice a security in the short run, but that the "correct" price will eventually be reached by the market. The fundamental analysis of a business involves analyzing a businesses: financial statements and health, management and competitive advantages, and competitors and markets. When applied to futures and forex, it focuses on the overall state of the economy, interest rates, production, earnings, and management.

Technical

Technical analysis maintains that all information is already reflected in the stock price. Technical analysis is a discipline for forecasting the direction of prices through the study of past market data, primarily price and volume. Generally, technical analysis employs models and trading rules based on price and volume transformations, such as the relative strength index, moving averages, regressions, inter-market and intra-market price correlations, business cycles, stock market cycles or, classically, through recognition of chart patterns.

Cyclical

Cyclical analysis generally targets cyclical stocks for purchase of equity securities when the ratio of price-to-earnings ("P/E Ratio") is low and sell them when the P/E Ratio is high (i.e. when earnings are peaking). The P/E Ratio is a measure of the price paid for a share relative to the annual net income or profit earned by the firm per share.

Sources of Information

The main sources of information that RIA Advisors uses to analyze these investment strategies is:

- Financial newspapers and magazines
- Research materials prepared by others
- Annual reports, prospectuses, filings with the SEC
- Company press releases

Other sources of information that we may use include:

- Morningstar Principia mutual fund information,
- Morningstar Principia stock information,
- Fidelity Institutional,
- TD Ameritrade Institutional,
- Zacks, and
- World Wide Web.

Investment Strategies

The investment strategies RIA Advisors uses to implement any investment advice given to clients includes the following:

- Long term Purchases (securities held at least a year)

- Short term purchases (securities sold within a year)
- Trading (securities sold within 30 days)
- Option writing, including covered options, uncovered options or spreading strategies
- Utilization of Alternative Investments (partnerships, hedge funds, commodity pools, etc.)

Investment Strategy Risks

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

General Risks

Lack of Diversification. Portfolio investments may be concentrated, and diversification may be limited. There are no limits with respect to position sizes. Any assets or combination of assets that can be held in a securities account can be purchased or sold.

Cash and Cash Equivalents. Accounts may maintain significant cash positions from time to time and the client will pay the Investment Management Fee based on the net asset value of the Account, including cash and cash equivalents. Furthermore, the Account may forego investment opportunities to hold cash positions if we consider it in the best interests of the Accounts.

Interest Rate Fluctuation. The prices of securities in which the Advisor may invest are sensitive to interest rate fluctuations and unexpected fluctuations in interest rates could cause the corresponding prices of the long and short portions of a position to move in directions which were not initially anticipated. In addition, interest rate increases generally will increase the interest carrying costs of borrowed securities and leveraged investments.

Long term Purchases (securities held at least a year). The portfolio may be invested in liquid and illiquid securities. You should be aware that liquid securities may become less liquid during the holding period.

Short term purchases (securities sold within a year). The success of a significant portion of the program will depend, to a great extent, upon correctly assessing the future course of the price movements of the securities traded. There can be no assurance that the trading program will be able to predict accurately these price movements. Additionally, over time, the effectiveness of the trading program may decline, including due to other market participants developing similar programs or techniques.

Trading (securities sold within 30 days). The success of a significant portion of a trading program will depend, to a great extent, upon correctly assessing the future course of the price movements of the securities traded. There can be no assurance that the trading program will be able to predict accurately these price movements. Additionally, over time, the effectiveness of the trading program may decline for many reasons, including other market participants developing similar programs or techniques.

Trading is Speculative. There are risks are involved in trading securities. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary and exchange control programs and policies; changing supply and demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and by regulation, in certain markets, often with the intent to influence prices directly. The effects of governmental intervention may be particularly significant at certain times in the financial instrument markets and such intervention (as well as other factors) may cause these markets to move rapidly.

Margin Risk. We may use leverage in investing. Such leverage may be obtained through various means. The use of short-term margin borrowings may result in certain additional risks to Accounts. For example, should the securities pledged to a broker to secure a margin account decline in value, a “margin call” may be issued pursuant to which additional funds would be required to be deposited with the broker or the broker would execute a mandatory liquidation of the pledged securities to compensate for the decline in value. We might not be able to liquidate assets quickly enough to pay off the margin debt and the Accounts may therefore also suffer additional significant losses as a result of such default. Although borrowing money increases returns if returns on the incremental investments purchased with the borrowed accounts exceed the borrowing costs for such accounts, the use of leverage decreases returns if returns earned on such incremental investments are less than the costs of such borrowings.

Utilization of Alternative Investments. Alternative investment products, including hedge funds, commodity hedged accounts and managed futures, involve a high degree of risk, often engage in leveraging and other speculative investment practices that may increase the risk of investment loss, can be highly illiquid, are not required to provide periodic pricing or valuation information to investors, may involve complex tax structures and delays in distributing important tax information, are not subject to the same regulatory requirements as mutual funds, often charge high fees which may offset any trading profits, and in many cases the underlying investments are not transparent and are known only to the investment manager.

ITEM 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

Our investment professionals who serve as your Portfolio Manager have access to all Client information obtained by us with respect to the particular Client accounts that they manage.

ITEM 8 – CLIENT CONTACT WITH PORTFOLIO MANAGERS

The primary point of contact for Clients with respect to our wrap fee advisory program is your professional investment advisory professional. There are no restrictions on a Client’s access to his or her professional investment advisory professional at RIA Advisor. With respect to third party portfolio managers and or sub-managers, they will be reasonably available to you for joint consultation along, with us, regarding your financial situation and

objectives, and the management by the respective third-party portfolio manager and or sub-managers of your investment portfolio.

ITEM 9 – ADDITIONAL INFORMATION

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of RIA Advisors or the integrity of RIA Advisors' management. RIA Advisors does not have any disciplinary items to disclose to our customers.

Other Financial Industry Activities and Affiliations

RIA Advisors is affiliated by common ownership with a firm that offers insurance products to RIA Advisors customers and other persons. The affiliated company is Alora Consulting, LLC ("Alora Consulting"), and offers general lines of Life, Health, Accident, Property, and Casualty Insurance. Alora Consulting may also do business as RIA Insurance.

All Investment Adviser Representatives of RIA Advisors are also insurance agents with Alora Consulting. To the extent insurance products are purchased through our advisors by advisory clients, our advisors will be paid a commission. This creates a conflict of interest as there is an incentive for Mr. Mack to recommend insurance products based on the compensation received, rather than on the client's needs. Notwithstanding such conflict of interest, RIA Advisors manages this conflict of interest by monitoring the suitability of such insurance products as a portion of the client's investment needs, by utilizing insurance products only where it is in the client's best interest, and after consultation with the client regarding the insurance products, which consultation includes the disclosure of such potential conflicts in accordance with our fiduciary duty as the client's adviser.

Code of Ethics

RIA Advisors has prepared a firm wide Code of Ethics for our investment professionals; the Code emphasizes the obligations of our firm and its employees to act in the best interests of our clients in providing investment advice. The Code of Ethics also specifies conduct prohibited by RIA Advisors. Violations of the Code are cause for disciplinary action. The Code also requires vigorous enforcement of the Code. A full and complete copy of the Code of Ethics will be provided to our clients and to prospective clients on their request.

RIA Advisors will not normally participate in client transactions. The investments that we recommend will normally be:

- mutual funds or ETF's operated by unrelated fund managers;
- widely traded equities or bonds;
- money market funds; or
- other broadly traded investments in which RIA Advisors or its affiliates have no financial interest.

Recommending that a client invest in an entity that an RIA Advisors employee has a material (more than 1%) interest will be absolutely prohibited.

There can be rare circumstances in which a cross agency trade happens (this is where one customer buys or sells a security that another customer owns or is acquiring); any cross-agency trades will be executed by the clearing firm or other custodial entity and take place at prevailing market prices. RIA Advisors will be limited in any potential cross agency trading involving customer securities.

RIA Advisors employee trading will be monitored and recorded. Our Code of Ethics prohibits trading ahead of a customer order or using any other scheme to obtain a better price on securities than the price a customer would pay when we have a customer ratification of an order in hand.

Brokerage Practices

RIA Advisors has custodial and trade execution arrangements in place with unaffiliated firms; including TD Ameritrade and Fidelity. RIA Advisors does not receive any special compensation or other economic benefit from advisory clients using any of the custodial firms with whom we have arrangements.

RIA Advisors can suggest which custodian the client should use at the beginning of the advisory relationship, but the decision for which broker to execute trades and act as custodian of assets rests with the client.

Aggregation of orders

The client assets under direct management of RIA Advisors are managed in accordance with a specific strategy and customized for each individual client. It can be advantageous if RIA Advisors aggregates orders for purchases or sales of securities. If that is done, all clients would receive the same price, typically an average price, on the securities purchased in an aggregate order.

As it relates to ERISA Plan business, the Adviser's model does not involve transactional business and, consequently, the Adviser does not currently engage brokers in any transactional capacity.

Best Execution

The Adviser does not trade in any Plan client accounts.

Trading

The Adviser does not trade in individual Plan participant accounts.

Review of Accounts

It is RIA Advisors policy to formally review each customer account at least once a year and, in most cases, the review will be done each quarter. RIA Advisors will review for investment performance, conformance with the clients' portfolio model, and accuracy of charges assessed to the client. Clients will generally receive monthly reports from the custodian detailing their individual assets and all activity in the client's account, unless

the client requests a more frequent basis. Some less active accounts receive quarterly reports from the custodian.

Any items needing follow-up will be documented and brought to the attention of the customer, if necessary. RIA Advisors customers may request an account review at any time.

Reviews will be done by Connie Mack, Managing Member and CCO.

Client Referrals and Other Compensation

At this time, we have an agreement with SmartAdvisor for client referrals, to whom we will pay a referral fee for prospects who become clients of RIA Advisors. The fee paid to SmartAdvisors does not affect the fee being paid by the client. RIA Advisors does not act as solicitor

In the future, RIA Advisors may receive some soft dollar compensation from our custodial brokers, but we do not receive such compensation at this time. "Soft Dollars" are services or price breaks that RIA Advisors would get from brokers for keeping our accounts with them or trading through their firm. The soft dollars can take the form of reduced ticket charges, which can be advantageous to our customers (depending on how we price their trading charges) or being given research, software, or equipment that we would normally pay for; these goods and services generally do not provide any direct or indirect benefit to our customers.

If we do receive soft dollars, the impact to the customer may be subtle. The main problem with this arrangement is the potential for soft dollars to influence our choice in brokerage firms and the firm that we use not being the best value for order execution, service, or soundness when compared to other brokerage firms. We will disclose to our customers any services or goods given to us by any 3rd party; this includes soft dollar arrangements.

Custody

RIA Advisors does not custody any of our clients' assets. All client assets, in direct management situations, will be held at Fidelity, TD Ameritrade, or other qualified custodians with whom we have such arrangements, if the client accepts our recommendation to use brokers with whom we have an existing business arrangement.

If the client does not accept RIA Advisors' recommendation for a broker, the client will be advised to select their own custodial broker with whom to place their account. The client will also be told that in this case, they will have the responsibility for executing any investment advice; in other words, the client will need to place buy or sell orders with their own broker to receive the full benefit of our investment advice.

Any requests for fund withdrawals must be directed to the broker holding the client's funds.

RIA Advisors does not bill clients more than \$1200.00 and 6 months in advance.

Investment Discretion

RIA Advisors normally manages client accounts on a discretionary basis. Clients can request that the account be managed on a non-discretionary basis, but due to market conditions, this can impair RIA Advisors' ability to make rapid changes in a customer's account should market conditions warrant quick changes of allocations and investments. All accounts, whether they are managed with discretion or without, are frequently reviewed for performance, compliance with the investment plan, and adherence to any special instructions given to us by the account owner.

Voting Client Securities

RIA Advisors does not vote proxies and or provide any advice or inducement to clients on any proxy vote. For clients with accounts that are directly managed by RIA Advisors, client equity securities will be held at another custodial institution. Our clients will have a brokerage account at the other institution that will forward proxies to clients or vote proxies in accordance with rules covering voting of proxies for securities not held in street name.

Financial Information

We are required to provide you with certain financial information or disclosures about financial condition which would impede our ability to provide the advisory services described herein. RIA Advisors has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.