

Clear Brook Advisors, Inc.

**420 Boylston Street, 5th Floor
Boston, MA 02116
Phone: (617) 315-8979**

www.clearbrookadvisors.com

**H. Whitney Wagner, President, CEO
C. Kenneth Strachan, Managing Director, CCO
Alexander Munnell, Director of Research
Colby Snyder, Associate
Ryan Landgraf, Analyst**

**420 Boylston Street, 5th Floor
Boston, MA 02116
Phone: (617) 315-8979**

March 2024

Additional information about C. Kenneth Strachan, Alexander Munnell, Colby Snyder, and Ryan Landgraf is available on the SEC's website at www.adviserinfo.sec.gov.

This brochure supplement provides information about the qualifications and business practices of these representatives as investment adviser representatives of Clear Brook Advisors, Inc. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.

Item 2: Educational Background and Business Experience

Name, Title: H. Whitney Wagner, President, CEO, (born 1956)

Education: University of Vermont, BA Political Science, 1978

Licenses: Series 65; CRD # 5141074

Business Background

2001 - present, Clear Brook Advisors, Inc. President & CEO

2000 - 2001, Quilvest, S.A., Advisor

1983 - 1999, Three Cities Research, Inc., Managing Director

1978 - 1983, Chemical Bank, Corporate Lending Officer

Item 3: Disciplinary Information

There are no legal or disciplinary matters that would be material to a client's or prospective client's evaluation of Mr. Wagner.

Items 4 & 5: Other Business Activity & Additional Compensation

H. Whitney Wagner serves as one of the Trustees for Brown Brothers Harriman Mutual Fund Group and receives compensation for his service on the Board of Brown Brothers Harriman Mutual Funds. Although Mr. Wagner is compensated for these activities, his service as a trustee accounts for less than 10% of his time and income. The receipt of compensation from BBH Mutual Funds is for Mr. Wagner's role as an independent Trustee. That compensation is not predicated on CBA clients investing in any of the BBH Mutual funds. CBA documents this compensation to all clients who then chose, in their own discretion, whether to invest or not in the BBH Mutual Funds.

Item 6: Supervision

H. Whitney Wagner is Chief Executive Officer and has ultimate responsibility for the management of Clear Brook Advisors. Mr. Wagner remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Wagner at the phone number listed on the cover of this brochure supplement.

Item 7: Requirements for State-Registered Advisors

A. In addition to the events listed in Item 3 of Part 2B, if the *supervised person* has been *involved* in one of the events listed below, disclose all material facts regarding the event.

(There is no involvement by any management person in any of the events listed in Item 1 or Item 2.)

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;

(d) bribery, forgery, counterfeiting, or extortion; or

(e) dishonest, unfair, or unethical practices.

2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative proceeding involving any of the following:

(a) an investment or an *investment-related* business or activity;

(b) fraud, false statement(s), or omissions;

(c) theft, embezzlement, or other wrongful taking of property;

(d) bribery, forgery, counterfeiting, or extortion; or

(e) dishonest, unfair, or unethical practices.

B. If the *supervised person* has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

(There is no involvement by any management person in any of the events listed in Item B.)

Item 2: Educational Background and Business Experience

Name, Title: C. Kenneth Strachan, Managing Director, CCO (born 1972)

Education: University of Virginia School of Law, Juris Doctor, 2000
Georgetown University, BS Foreign Service, 1995

Licenses: Series 65; CRD # 6918736

Business Background

2018 - Present, Clear Brook Advisors, Inc., Managing Director, CCO

2014 - 2017, Freeaire, Managing Director and General Counsel

2008 - 2014, Next Generation Vending, LLC, General Counsel and Secretary

2004 - 2008, Municipal Benchmarking, LLC, President and General Manager

Item 3: Disciplinary Information

There are no legal or disciplinary matters that would be material to a client's or prospective client's evaluation of Mr. Strachan.

Items 4 & 5: Other Business Activity & Additional Compensation

C. Kenneth Strachan serves on the investment committees of Rio Fuerte Enterprises, LP and Rio Fuerte Capital, LP, two related entities that invest on behalf of Mr. Strachan's extended family. Mr. Strachan receives a token stipend for these activities; this compensation accounts for less than 5% of his time and income. Mr. Strachan's service on these investment entities does not create a material conflict of interests with clients as these entities invest along-side clients of Clear Brook and is aligned with the outcome for such clients.

Item 6: Supervision

H. Whitney Wagner remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Wagner at the phone number listed on the cover of this brochure supplement.

Item 7: Requirements for State-Registered Advisors

A. In addition to the events listed in Item 3 of Part 2B, if the *supervised person* has been *involved* in one of the events listed below, disclose all material facts regarding the event.

(There is no involvement by any management person in any of the events listed in Item 1 or Item 2.)

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;

- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative proceeding involving any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

B. If the *supervised person* has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

(There is no involvement by any management person in any of the events listed in Item B.)

Item 2: Educational Background and Business Experience

Name, Title: Alexander A. Munnell, Director of Research (born 1983)

Education: Vanderbilt University, BS, Engineering Science, 2006
Harvard University – MBA, Finance, 2017

License: Series 65; CRD # 5296229

Business Background

2013 to present, Clear Brook Advisors, Inc.
2011 - 2013, Ryse, Inc., risk management consulting business
2010 - 2011, Student – Boston University
2007 - 2009, Downer & Company, international boutique investment bank

Item 3: Disciplinary Information

There are no legal or disciplinary matters that would be material to a client's or prospective client's evaluation of Mr. Munnell.

Items 4 & 5: Other Business Activity & Additional Compensation

Mr. Munnell does not engage in any other investment-related business activity or receive additional compensation outside of his role at Clear Brook Advisors.

Item 6: Supervision

H. Whitney Wagner remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Wagner at the phone number listed on the cover of this brochure supplement.

Item 7: Requirements for State-Registered Advisors

A. In addition to the events listed in Item 3 of Part 2B, if the *supervised person* has been *involved* in one of the events listed below, disclose all material facts regarding the event.

(There is no involvement by any management person in any of the events listed in Item 1 or Item 2.)

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative proceeding involving any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

B. If the *supervised person* has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

(There is no involvement by any management person in any of the events listed in Item B.)

Item 2: Educational Background and Business Experience

Name, Title: Colby Snyder, Associate (born 1996)

Education: University of Vermont, BS, Business Administration, 2018

License: Series 65; CRD # 7053084

Business Background

2018 to Present, Clear Brook Advisors, Inc.

2017 - Summer Analyst, Stone Harbor Investment Partners, New York, NY

2016 - Intern, Hannon Armstrong Sustainable Infrastructure Capital, Annapolis, MD

Item 3: Disciplinary Information

There are no legal or disciplinary matters that would be material to a client's or prospective client's evaluation of Ms. Snyder.

Items 4 & 5: Other Business Activity & Additional Compensation

Ms. Snyder does not engage in any other investment-related business activity or receive additional compensation outside of her role at Clear Brook Advisors.

Item 6: Supervision

H. Whitney Wagner remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Wagner at the phone number listed on the cover of this brochure supplement.

Item 7: Requirements for State-Registered Advisors

A. In addition to the events listed in Item 3 of Part 2B, if the *supervised person* has been *involved* in one of the events listed below, disclose all material facts regarding the event.

(There is no involvement by any management person in any of the events listed in Item 1 or Item 2.)

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative proceeding involving any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

B. If the *supervised person* has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

(There is no involvement by any management person in any of the events listed in Item B.)

Item 2: Educational Background and Business Experience

Name, Title: Ryan Landgraf, Analyst (born 1997)

Education: University of Vermont, BS, Business Administration, 2021

License: Series 65; CRD # 5697822

Business Background

2021 to Present, Clear Brook Advisors, Inc.

2020 – Intern Retail Lending Team, Mascoma Savings Bank, White River Junction, VT.

Item 3: Disciplinary Information

There are no legal or disciplinary matters that would be material to a client's or prospective client's evaluation of Mr. Landgraf.

Items 4 & 5: Other Business Activity & Additional Compensation

Mr. Landgraf does not engage in any other investment-related business activity or receive additional compensation outside of her role at Clear Brook Advisors.

Item 6: Supervision

H. Whitney Wagner remains responsible for the supervision of each employee of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Wagner at the phone number listed on the cover of this brochure supplement.

Item 7: Requirements for State-Registered Advisors

A. In addition to the events listed in Item 3 of Part 2B, if the *supervised person* has been *involved* in one of the events listed below, disclose all material facts regarding the event.

(There is no involvement by any management person in any of the events listed in Item 1 or Item 2.)

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:

- (f) an investment or an *investment-related* business or activity;
- (g) fraud, false statement(s), or omissions;
- (h) theft, embezzlement, or other wrongful taking of property;
- (i) bribery, forgery, counterfeiting, or extortion; or
- (j) dishonest, unfair, or unethical practices.

2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative proceeding involving any of the following:

- (k) an investment or an *investment-related* business or activity;
- (l) fraud, false statement(s), or omissions;
- (m) theft, embezzlement, or other wrongful taking of property;
- (n) bribery, forgery, counterfeiting, or extortion; or
- (o) dishonest, unfair, or unethical practices.

B. If the *supervised person* has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

(There is no involvement by any management person in any of the events listed in Item B.)