

Mountain View Strategic Wealth, LLC



**200 North Drive
iPark Suite 103
Hopewell Junction, NY 12533
Telephone: (845) 834-4343
and (914) 281-3495
Fax: (845) 834-4344**

**800 Route 146, Suite 385
Clifton Park, NY 12065
Telephone: (518) 351-4213**

FORM ADV PART 2A BROCHURE

COVER PAGE

March 28, 2024

This brochure provides information about the qualifications and business practices of Mountain View Strategic Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at (845) 834-4343 or john@mvswealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Mountain View Strategic Wealth, LLC is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Mountain View Strategic Wealth, LLC is also available on the SEC's website at <https://adviserinfo.sec.gov/>. The searchable IARD/CRD number for Mountain View Strategic Wealth, LLC is 154295.

Item 2 – Material Changes

Mountain View Strategic Wealth, LLC is required to discuss any material changes that have been made to the brochure since the last annual amendment dated March 31, 2023.

Summary of changes that have occurred since the prior annual update:

- We have no material changes to report.

If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

A copy of our current Brochure may be requested by contacting the Mountain View Strategic Wealth, LLC Client Center at 845-834-4343, option 2.

Mountain View Strategic Wealth, LLC and Chief Compliance Officer John S. Morgan, AIF®, APMA® will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the firm's fiscal year-end (December 31). In addition, the firm will disclose material changes promptly as they occur and offer an amended brochure without charge.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	8
Item 6 – Performance-Based Fees and Side-By-Side Management	11
Item 7 – Types of Clients	11
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	12
Item 9 – Disciplinary Information	14
Item 10 – Other Financial Industry Activities and Affiliations	14
Item 11 – Code of Ethics	15
Item 12 – Brokerage Practices	16
Item 13 – Review of Accounts	18
Item 14 – Client Referrals and Other Compensation	18
Item 15 – Custody	19
Item 16 – Investment Discretion	20
Item 17 – Voting Client Securities	20
Item 18 – Financial Information	20

Item 4 – Advisory Business

Mountain View Strategic Wealth, LLC (“the Firm,” “we”, “our,” or “us”) is a fee-based registered investment adviser based in Hopewell Junction, New York. The Firm is organized as a limited liability company under the laws of the State of New York. The Firm provides portfolio management and financial planning for individuals, families, retirement plans, corporations, and trusts.

John S. Morgan, AIF®, APMA® is the Managing Principal, President, Chief Investment Officer, and Chief Compliance Officer of the Firm and has served in those roles since 2018; the Registered Investment Advisor was formed in 2010. As of December 31, 2023, Mountain View Strategic Wealth, LLC had \$42,602,479 in assets under management, \$42,602,479 of which was managed on a discretionary basis.

Mountain View Strategic Wealth, LLC is committed to helping clients (“you”, “your,” or “client”) build, manage, and preserve wealth, and to provide assistance to clients to help achieve their stated financial goals and investment objectives. We offer a variety of advisory services, which include financial planning, financial consulting, and investment management services. Prior to the Firm rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with Mountain View Strategic Wealth, LLC setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”).

While this brochure generally describes the business of Mountain View Strategic Wealth, LLC, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees, independent contractors or any other person who provides investment advice on Mountain View Strategic Wealth’s behalf and is subject to the Firm’s supervision or control.

This independent financial adviser provides wealth management services by incorporating financial planning, investment portfolio management, insurance planning, and estate planning. The combination of industry experience and comprehensive research allows the firm to provide quality advisory services to our clients tailored to their individual needs and circumstances.

Investment Management Services

Mountain View Strategic Wealth, LLC manages client investment portfolios on a discretionary basis; at the firm’s discretion, we may accept non-discretionary accounts. The Firm primarily allocates client assets among various exchange traded funds (ETFs), mutual funds, and individual debt and equity securities in accordance with their stated investment objectives. Where appropriate, the Firm may also provide advice about any type of legacy position or other investment held in client portfolios. Clients may engage us to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance, variable annuity contracts, assets held in employer sponsored retirement plans, and qualified tuition plans (i.e., 529 plans). In these situations, Mountain View Strategic Wealth, LLC directs or recommends the allocation of client assets among the various investment options

available within the product. These assets are generally maintained at the underwriting insurance company, or the custodian designated by the product's provider.

Mountain View Strategic Wealth, LLC typically begins its investment management services by building a client profile or similar document that provides questions regarding a client's time horizon, long-term goals and expectations, and short-term risk attitudes. This will help clients identify their most comfortable style of management. Clients may also indicate any special instructions or limits in managing assets. Those instructions must be in writing.

Through continuous monitoring of asset class segments' return and risk factors, the Firm may change portfolio asset mixes in an effort to help meet objectives. The specific percentages allocated to each asset class may vary due to the nature of asset performance and/or the strategy selected. It is the Firm's intent to maintain risk exposure commensurate with each client's objectives by using the various investment portfolio choices available under the strategy selected by that client.

Mountain View Strategic Wealth, LLC tailors advisory services to meet the needs of individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. The Firm's IARs consult with clients on an initial and ongoing basis to assess your specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of your portfolio. Clients are advised to promptly notify Mountain View Strategic Wealth, LLC if there are changes in your financial situation or if you wish to place any limitations on the management of your portfolio. Clients may impose reasonable restrictions or mandates on the management of your accounts if Mountain View Strategic Wealth, LLC determines, in our sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

Financial Planning and Consulting Services

The Firm's investment management services may include the analysis of a client's situation and assistance in identifying and implementing appropriate financial planning and investment management techniques to help meet specific financial objectives. Our financial planning and consulting services may include any or all of the following functions:

- Determination of appropriate income planning strategies for both pre- and post-retirement.
- Review of existing and proposed investment asset mixes.
- Calculation of pre-retirement savings and investing needs.
- Assessment of overall financial position including net worth, cash flow, and debt.
- Comprehensive analysis of IRA-related issues.
- Estimates of federal estate taxes and a suggested plan of action to help meet estate planning objectives.
- Review and determination of life and disability insurance needs.
- Suggestions for minimizing federal and state income tax obligations.
- Development of investment strategies consistent with business ownership succession and transition planning.

In performing these services, Mountain View Strategic Wealth, LLC is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, tax advisors, etc.) and is expressly authorized to rely on such information. Mountain View Strategic Wealth, LLC may recommend clients engage the Firm for additional related services, through its Supervised Persons, in their individual capacities as insurance agents, to implement its recommendations. Clients are advised that a conflict of interest exists if clients engage the Firm or its affiliates to provide additional services for compensation. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by Mountain View Strategic Wealth, LLC under a financial planning or consulting engagement. Clients are advised that it remains your responsibility to promptly notify the Firm of any change in your financial situation or investment objectives for the purpose of reviewing, evaluating, or revising the Firm's recommendations and/or services.

Mountain View Strategic Wealth, LLC also advises clients with respect to investments held in their accounts without implementing the recommended transactions. Under such an arrangement, the client may, at your discretion, choose to implement any of our recommendations. Depending on the nature of the specific consulting agreement, Mountain View Strategic Wealth, LLC may have ongoing monitoring obligations over a client account or may be consulted by the client on an ad hoc basis.

Retirement Plan Advisory Services

Retirement Plan Advisory Services consists of helping employer plan sponsors to establish, monitor and review their company's retirement plan. As the needs of the plan sponsor dictate, areas of advising could include investment selection and monitoring, plan design/structure, and participant education.

Mountain View Strategic Wealth, LLC offers management of 401(k), 457, and 403(b) accounts both on a plan level and on the individual participant level. At the plan level the Firm manages the investment line-up making changes as necessary as well as providing risk-based investment models for the participants. On the individual participant level, the Firm manages risk-based models using the current investment lineup based on risk tolerance of the individual investor.

Plan Level

Mountain View Strategic Wealth, LLC will establish the plan's needs and objectives through an initial meeting(s) to collect data, review plan information, and assist in developing or updating the plan's provisions. Ongoing services may include recommendations regarding the selection and review of unaffiliated mutual funds that, in the Firm's judgment, are suitable for plan assets to be invested. The Firm periodically reviews the investment options selected and makes recommendations to keep or replace plans investment options as appropriate. Mountain View Strategic Wealth, LLC performs a comprehensive review of Investment options and will assist with converting from incumbent service providers to a new service provider, if appropriate.

The Firm will provide periodic recommendations for the plan's investment allocation. Upon receipt, the Firm will review the investment options and provide positions for accounts in accordance with the management style chosen by the client. The analysis with specific fund

positions will be sent to the client. Clients are responsible for making the fund changes within the account or may hire Mountain View Strategic Wealth to serve as an investment manager to replace funds and/or update models, as needed.

Participant Level

The Firm can also be engaged to provide financial education to plan participants. The scope of education provided to participants will not constitute “investment advice” within the meaning of ERISA and participant education will relate to general principles for investing and information about the investment options currently in the plan. Mountain View Strategic Wealth, LLC may also participate in initial enrollment meetings and periodic workshops and enrollment meetings for new participants.

Conflict of Interest – IRA Rollover Recommendations

When recommending that a client rollover his or her account from current retirement plan to an IRA, Mountain View Strategic Wealth, LLC and our Investment Adviser Representatives have a conflict of interest. Mountain View Strategic Wealth, LLC and its representatives can earn investment advisory fees by recommending that a client rollover his or her account at the retirement plan to an IRA; however, the Firm and its Investment Adviser Representatives will not earn any investment advisory fee if client does not rollover the funds in the retirement plan (unless a client retained the firm to provide advice about the client’s retirement plan account or the retirement plan has retained the firm to provide advice at the plan level). Thus, Mountain View Strategic Wealth, LLC and its Investment Adviser Representatives have an economic incentive to recommend a rollover of the retirement plan account, which is a conflict of interest. We have taken steps to manage this conflict of interest arising from rolling over funds from an ERISA-covered retirement plan to an IRA. The Firm and its Investment Adviser Representatives will (i) provide investment advice to an ERISA-covered retirement plan participant regarding a rollover of funds from the ERISA-covered retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in the firm receiving unreasonable compensation related to the rollover of funds from the ERISA-covered retirement plan to an IRA, and (iii) fully disclose compensation received by the Firm and its supervised persons and any material conflicts of interest related to recommending the rollover of funds from the ERISA-covered retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice),

- Never put our financial interests ahead of yours when making recommendations (give loyal advice),
- Avoid misleading statements about conflicts of interest, fees, and investments,
- Follow policies and procedures designed to ensure that we give advice that is in your best interest,
- Charge no more than is reasonable for our services, and
- Give you basic information about conflicts of interest.

Item 5 – Fees and Compensation

Investment Management Fees

Mountain View Strategic Wealth, LLC offers investment management services for an annual fee based on the amount of assets under the Firm's management. The specific manner in which fees are charged by Mountain View Strategic Wealth, LLC is established in a client's written agreement with the Firm. We will generally bill fees on a monthly basis, in advance, based upon the market value of the assets being managed by Mountain View Strategic Wealth, LLC on the last day of the previous billing period, at the beginning of each month. Accounts initiated during a month will be charged a prorated fee. There are accounts which have been and will be billed fees on a quarterly basis in arrears.

The annual fee for managing a portfolio is charged as a percentage of the assets under management, according to the following tiered schedule:

Assets Under Management	Annual Fee
\$1 to \$100,000	1.45%
\$100,000.01 to \$500,000	1.25%
\$500,000.01 to \$1,000,000	1.15%
\$1,000,000.01 to \$3,000,000	1.00%
\$3,000,000.01 to \$5,000,000	0.85%
Above 5,000,000	Negotiated

The annual fee applied to all of each clients' accounts will be determined by the total assets under management for the client. Mountain View Strategic Wealth, LLC may aggregate the portfolios of family members to determine a client's assets under management and the corresponding annual fee. The annual fee is clearly disclosed within the client's written agreement.

The annual fee percentage each client is charged will be reviewed at least annually. If, due to growth of assets under management or an automatic systematic contribution plan, the lower limit of a different (lower) annual fee has been exceeded at the time of the annual fee review,

the new (lower) annual fee percentage will take effect on the following January 1. The annual fee percentage will be adjusted if a one-time deposit of additional assets (check, transfer of assets, wire, ACH, EFT, etc.) into accounts managed by Mountain View Strategic Wealth, LLC causes the client's assets under management to exceed the lower limit of a different (lower) annual fee effective on the first of the month following the deposit.

To calculate the amount of the management fee for a billing period, the assets under management shall be multiplied by the annual fee percentage adjusted for either a monthly or quarterly billing. As an example of typical advanced billing, for the month beginning April 1, the fees would be calculated based on the assets under management at the close of market on March 31. Initially, the annual fee will be prorated based on the initial market value of the assets upon inception for the remainder of the billing period. Other fee arrangements may be agreed to with prior approval in writing.

If assets in excess of \$0 are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is adjusted in the next billing cycle to reflect the interim change in portfolio value. For the initial period of an engagement, the fee is calculated on a pro rata basis. Cash is considered an asset class and we do include cash balances in the fee calculation. Your fee will exceed the money market yield when money market yields are below your agreed upon fee.

The Investment Advisory Agreement may be terminated by the client within five (5) business days of signing the Agreement without penalty or incurring any advisory fees. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

Additionally, for asset management services the Firm provides with respect to certain client holdings (e.g., held away assets, accommodation accounts, alternative investments, etc.), Mountain View Strategic Wealth, LLC may negotiate a fee rate that differs from the range set forth above.

Clients should also note that fees for comparable services vary and lower fees for comparable services may be available from other firms or sources.

Fee Discretion

Mountain View Strategic Wealth, LLC may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention, and pro bono activities. Also, certain family members of Mountain View Strategic Wealth, LLC's professionals may receive advisory services at a discounted rate that is not generally available to the general public.

Financial Planning and Consulting Fees

Mountain View Strategic Wealth, LLC generally charges a fixed and/or hourly fee for providing financial planning and consulting services under a stand-alone engagement. These fees are negotiable and generally range from \$1,850 to \$9,600 on a fixed fee basis or from \$200 to \$500 on an hourly basis, depending upon the scope and complexity of the services and the professional rendering the financial planning and/or the consulting services. If the client engages the Firm for additional investment advisory services, we may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

The terms and conditions of the financial planning and/or consulting engagement are set forth in the Advisory Agreement and Mountain View Strategic Wealth, LLC generally requires one-half of the fee (estimated hourly or fixed) payable upon execution of the Advisory Agreement. The outstanding balance is generally due upon delivery of the financial plan or completion of the agreed upon services. Typically, a plan is completed within one month and will be presented to the client within 90 days of the contract date, provided that the Firm is provided with all necessary information. If the work is not completed in such a time, the Firm may refund fees on a prorated basis. If the client cancels the financial planning engagement within the first week of signing the agreement, the Firm will refund 50% of the fee. The Firm does not take receipt of \$1,200 or more in prepaid fees more than six months in advance of services rendered.

Retirement Advisory Fees

Mountain View Strategic Wealth, LLC bills quarterly for retirement plan advisory services, based on the market value of the assets on the last day of the quarter as reported by the custodian. The fee is negotiated on a case-by-case basis and is disclosed in the agreement with the plan. Fees are assessed pro rata in the event the Agreement is executed at any time other than the first day of a calendar month. The fee is based on a percentage of assets under management. Fees are assessed on all assets under management, including securities, cash, and money market balances. Margin debit balances do not reduce the value of assets under management. This agreement may be terminated by you, effective on the last day of the then current fiscal quarter month, if you provide at least 30 days' prior written notice of termination; or by Mountain View Strategic Wealth, LLC effective three (3) business days after the sending of a written notice of termination to you. You may cancel this agreement within five (5) days after written notice.

Additional Fees and Expenses

In addition to the advisory fees paid to Mountain View Strategic Wealth, LLC, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks, and other financial institutions (collectively "Financial Institutions"). These additional charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by the Independent Managers, margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage

accounts and securities transactions. The Firm's brokerage practices are described at length in Item 12.

Direct Fee Debit

Clients generally provide Mountain View Strategic Wealth, LLC and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Mountain View Strategic Wealth, LLC. Alternatively, clients may elect to have Mountain View Strategic Wealth, LLC send a separate invoice for direct payment.

Use of Margin

Mountain View Strategic Wealth, LLC does not use margin as an investment strategy. Clients may authorize the use of margin loans on a case-by-case basis. In these cases, the fee payable will be based on the value of all securities in the account and does not account for the account debt for margin securities.

Account Additions and Withdrawals

Clients may make additions to and withdrawals from their account at any time, subject to Mountain View Strategic Wealth, LLC's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients may withdraw account assets on notice to Mountain View Strategic Wealth, LLC, subject to the usual and customary securities settlement procedures. However, the Firm generally designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a client's investment objectives. Mountain View Strategic Wealth, LLC may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

Item 6 - Performance-Based Fees and Side-by-Side Management

Mountain View Strategic Wealth, LLC does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

Item 7 - Types of Clients

Mountain View Strategic Wealth, LLC offers services to individuals, banks or thrift institutions, pension and profit-sharing plans, trusts, estates, foundations, charitable organizations, corporations, and business entities.

Mountain View Strategic Wealth, LLC does not impose a minimum portfolio value. Mountain View Strategic Wealth, LLC is careful in determining that smaller portfolio size will not cause a substantial increase of investment risk beyond the client's identified risk tolerance.

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

Methods of Analysis & Investment Strategies

Mountain View Strategic Wealth, LLC employs multiple styles, managers, strategies and investing methodologies. The firm utilizes a broad range of investment solutions in order to address a particular's client's needs and investment objectives. The firm utilizes both internal and external research to formulate a broad range of investment solutions. The Firm employs multiple investing styles which consist of but are not limited to the following: i) Strategic Allocation; ii) Tactical Allocation; iii) Individual Equity Selection; and iv.) Customized Portfolio Design. Within each style "sleeve" the firm offers multiple portfolio management strategies also referred to as "programs." Below is a summary of the management styles offered. In order to obtain more information regarding any proposed investment strategy, the client is encouraged to contact their Investment Advisor Representative directly for more information regarding a particular investment strategy.

Risk of Loss

Clients must understand that past performance is not indicative of future results. Therefore, current and prospective clients should never assume that the future performance of any specific investment or investment strategy will be profitable. Investing in securities involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal. Because of the inherent risk of loss associated with investing, the firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. Investors should be aware that accounts are subject to the following risks:

- **Stock Market Risk** – The value of securities in the portfolio will fluctuate and, as a result, the value may decline suddenly or over a sustained period of time.
- **Managed Portfolio Risk** – The manager's investment strategies or choice of specific securities may be unsuccessful and may cause the portfolio to incur losses.
- **Industry Risk** – The portfolio's investments could be concentrated within one industry or group of industries. Any factors detrimental to the performance of such industries will disproportionately impact your portfolio. Investments focused in a particular industry are subject to greater risk and are more greatly impacted by market volatility than less concentrated investments.
- **Non-U.S. Securities Risk** – Non-U.S. securities are subject to the risks of foreign currency fluctuations, generally higher volatility and lower liquidity than U.S. securities, less developed securities markets and economic systems and political and economic instability.

- Emerging Markets Risk – To the extent that your portfolio invests in issuers located in emerging markets, the risk may be heightened by political changes and changes in taxation or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- Currency Risk – The value of your portfolio's investments may fall as a result of changes in exchange rates.
- Interest Rate Risk - The value of fixed income securities rises or falls based on the underlying interest rate environment. If rates rise, the value of most fixed income securities could go down.
- Credit Risk - Most fixed income instruments are dependent on the underlying credit of the issuer. If we are wrong about the underlying financial strength of an issuer, we may purchase securities where the issuer is unable to meet its obligations. If this happens, your portfolio could sustain an unrealized or realized loss.
- Inflation Risk - Most fixed income instruments will sustain losses if inflation increases or the market anticipates increases in inflation. If we enter a period of moderate or heavy inflation, the value of your fixed income securities could go down.
- ETF and Mutual Fund Risk – When we invest in an ETF or mutual fund for a client, the client will bear additional expenses based on its pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients may also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with us varies with the success and failure of our investment strategies, research, analysis, and determination of portfolio.
- Options Risk - Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- Timing Risk –The risk that a client takes when trying to buy or sell a stock based on future price predictions. Timing risk is the potential for missing out on beneficial movements in price due to an error in timing. This could cause harm to the value of your portfolio because of purchasing too high or selling too low.
- Leverage Risk – Leverage is used to increase potential return on an investment. If leverage is used to make an investment and the investment moves against the investor, the loss is much greater than it would have been if the investment had not been leveraged. Leverage typically magnifies both gains and losses.
- Liquidity Risk – The risk that a client takes when implementing investment objectives that could occur as the result of an economic downturn in the U.S. or global economy resulting in the need to sell investments on short notice resulting in a loss of principal in order to maintain the desired liquidity.
- Third-party Money Management – Clients should read the Form ADV Part 2A of any respective third-party money manager to understand the investment strategies and methods of analysis employed by the third-party money manager, and the risks associated with those. Prospective investors should carefully consider all risks, as there can be no assurance that the asset management programs by the third-party managers will achieve their respective investment objectives or avoid substantial losses. An

investor should not make an investment with the expectation of sheltering income or receiving cash distributions.

- Closed-End/Interval Funds - Clients should be aware that closed-end funds available within the program may not give investors the right to redeem their shares, and a secondary market may not exist. Therefore, clients may be unable to liquidate all or a portion of their shares in these types of funds. While the fund may from time to time offer to repurchase shares, it is not obligated to do so (unless it has been structured as an "interval fund"). In the case of interval funds, the fund will provide limited liquidity to shareholders by offering to repurchase a limited number of shares on a periodic basis, there is no guarantee that you will be able to sell all of the shares in any particular repurchase offer. The repurchase offer program may be suspended under certain circumstances.
- Alternative Investments – Investing in Alternative Investments ("Alternatives") involves the assumption of risk, including: There may be no public market so these Alternatives could not be sold quickly or rebalanced. The holding period will vary by product before a liquidation event is executed. Many Alternatives are not registered with the Securities and Exchange Commission, so they do not afford the benefits of public reporting and disclosure. The Firm will limit the percentage of Alternatives held in a managed account based on your liquidity needs, net worth, investment objectives, risk tolerance, and any state or regulatory limitations. Alternatives may not be purchased on a discretionary basis.
- Cyber Security Risk –Breaches or failures of electronic systems of securities market participants or the issuers of securities can cause significant losses for investors.

Item 9 - Disciplinary Information

The Firm is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. Mountain View Strategic Wealth, LLC does not have any required disclosures.

Item 10 - Other Financial Industry Activities and Affiliations

This item requires investment advisers to disclose certain financial industry activities and affiliations. The Firm does not have any other financial industry activities or affiliations that need to be disclosed.

Licensed Insurance Agents

The Firm's Supervised Persons are licensed insurance agents with various insurance companies and may offer certain insurance products on a fully disclosed commissionable basis. A conflict of interest exists to the extent that Mountain View Strategic Wealth, LLC recommends the purchase of insurance products where its Supervised Persons may be entitled to insurance commissions or other additional compensation. The Firm has procedures in place whereby it

seeks to ensure that all recommendations are made in its clients' best interests regardless of any such affiliations.

Item 11 - Code of Ethics

Mountain View Strategic Wealth, LLC and persons associated with the firm are allowed to invest for their own accounts or to have a financial investment in the same securities or other investments that Mountain View Strategic Wealth, LLC recommends or acquires for a client's account and may engage in transactions that are the same as or different than transactions recommended to or made for a client's account. This creates a conflict of interest. Mountain View Strategic Wealth, LLC recognizes the fiduciary responsibility to act in your best interest and have established policies to mitigate conflicts of interest.

Mountain View Strategic Wealth, LLC has developed and implemented a Code of Ethics that sets forth standards of conduct expected of the advisory personnel to mitigate this conflict of interest. The Code of Ethics addresses, among other things, personal trading, gifts, the prohibition against the use of inside information.

The Code of Ethics is designed to protect clients, to detect and deter misconduct, educate personnel regarding the firm's expectations and laws governing their conduct, remind personnel that they are in a position of trust and must act with complete propriety at all times, protect the reputation of Mountain View Strategic Wealth, LLC, guard against violation of the securities laws, and establish procedures for personnel to follow so that we may determine whether personnel are complying with the firm's ethical principles.

Mountain View Strategic Wealth, LLC has established the following restrictions in order to ensure the firm's fiduciary responsibilities:

- A director, officer or employee of Mountain View Strategic Wealth, LLC shall not buy or sell any securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No supervised employee of Mountain View Strategic Wealth, LLC shall prefer his or her own interest to that of the advisory client.
- Mountain View Strategic Wealth, LLC maintains a list of all securities holdings of anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer/individual of Mountain View Strategic Wealth, LLC.
- Mountain View Strategic Wealth, LLC emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where we are granted discretionary authority of the client's account.
- Mountain View Strategic Wealth, LLC requires that all supervised employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.

Any supervised employee not in observance of the above may be subject to termination.

Investment Policy

None of our associated persons may effect for himself/herself or for accounts in which he/she holds a beneficial interest, any transactions in a security which is being actively recommended to any of our clients, unless in accordance with the Firm's procedures.

You may request a complete copy of our Code by contacting the Chief Compliance Officer at the address, telephone, or email on the cover page of this Brochure.

Item 12 - Brokerage Practices

Recommendation of Broker/Dealers for Client Transactions

Mountain View Strategic Wealth, LLC generally recommends that clients utilize the custody, brokerage and clearing services of Fidelity Institutional Wealth Services ("Fidelity," "Custodian," or "Custodians") for investment management accounts.

Factors which Mountain View Strategic Wealth, LLC considers in recommending Custodians to clients include their respective financial strength, reputation, execution, pricing, research, and service. Custodians may enable the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Custodians may be higher or lower than those charged by other Financial Institutions.

The commissions paid by Mountain View Strategic Wealth, LLC' clients to the Custodians comply with the Firm's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates and responsiveness. Mountain View Strategic Wealth, LLC seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions. Trades may be executed through a "step-out transaction," meaning that they are traded away from the Client's Custodian. Certain transactions, including block trades in which Mountain View Strategic Wealth, LLC aggregates securities purchases or sales for a client account with those of one or more of its other clients, Mountain View Strategic Wealth, LLC will, pursuant to its duty to seek best execution, determine to execute using step-out transactions (also referred to as "trade-aways"). As such, the Client may be required to pay a commission. Whenever Mountain View Strategic Wealth, LLC makes such a determination with respect to this type of transaction, Mountain View Strategic Wealth, LLC will cause the Client account and in the case of a block trade, any other included client accounts, to pay the executing broker-dealer or the execution service provider, a commission or commission equivalent. These commission or commission equivalents are charged to the client's account and are netted into the price received for a security and will not be reflected as individual items on the client trade confirmation.

Transactions may be cleared through other broker-dealers with whom the Firm and its custodians have entered into agreements for prime brokerage clearing services. Should an account make use of prime brokerage, the Client may be required to sign an additional agreement, and additional fees are likely to be charged.

Software and Support Provided by Financial Institutions

Mountain View Strategic Wealth, LLC may receive without cost from the Custodians computer software and related systems support, which allow Mountain View Strategic Wealth, LLC to better monitor client accounts maintained at the Custodians. Mountain View Strategic Wealth, LLC may receive the software and related support without cost because the Firm renders investment management services to clients that maintain assets at the Custodians. The software and support is not provided in connection with securities transactions of clients (i.e., not “soft dollars”). The software and related systems support may benefit Mountain View Strategic Wealth, LLC, but not its clients directly. In fulfilling its duties to its clients, Mountain View Strategic Wealth, LLC endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Mountain View Strategic Wealth, LLC’s receipt of economic benefits from a broker/dealer creates a conflict of interest since these benefits may influence the Firm’s choice of broker/dealer over another that does not furnish similar software, systems support, or services.

Specifically, Mountain View Strategic Wealth, LLC may receive the following benefits from the Custodians: Receipt of duplicate client confirmations and bundled duplicate statements, access to a trading desk that exclusively services its institutional traders, access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts, and access to an electronic communication network for client order entry and account information.

Brokerage for Client Referrals

Mountain View Strategic Wealth, LLC does not receive client referrals from the Financial Institutions or other third-party, and therefore, does not consider, in selecting or recommending broker/dealers, whether the Firm receives client referrals from the Financial Institutions or other third-party.

Order Aggregation and Block Trades

When the purchase or sale of a particular security is appropriate for more than one client account, trades for advisory clients may be aggregated. Mountain View Strategic Wealth, LLC’s policy is to aggregate client transactions where possible and when advantageous to clients (generally referred to as a “block trade”). In these instances, clients participating in aggregated transactions will receive an average share price. As a matter of policy, an advisor’s allocation procedures must be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients. Mountain View Strategic Wealth, LLC’s policy prohibits any allocation or trades in a manner that the Firm’s affiliated accounts, or any particular client(s) or group of clients receive more favorable treatment than other client accounts. Generally, Mountain View Strategic Wealth, LLC allocates partially filled trade orders on a pro

rata basis. However, other allocation practices may include exception allocations, random allocations, and rotational allocations, depending on the asset involved.

Trade Errors

Trade errors in client accounts cannot always be avoided. Consistent with our fiduciary duty, it is our policy to correct trade errors in a manner that is in the best interest of our clients. In cases where a client causes the trading error, the client will be responsible for any loss resulting from the correction. In all situations where the client does not cause the trading error, the client will be made whole, and Mountain View Strategic Wealth, LLC will absorb any loss resulting from the trading error if the error was caused by our firm. If the error is caused by the broker/dealer, the broker/dealer will be responsible for covering all trade error costs.

Item 13 - Review of Accounts

Account Reviews

Mountain View Strategic Wealth, LLC monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least a quarterly basis. Such reviews are conducted by the portfolio managers and/or investment adviser representatives. The frequency of reviews will depend upon the complexity of the accounts, the nature of the advisory recommendations, changes in tax or market conditions, as well as other conditions and material changes to the client's situation. All investment advisory clients are encouraged to discuss their needs, goals and objectives with Mountain View Strategic Wealth, LLC and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and quarterly to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. Clients may also receive written or electronic reports from an outside service provider on a quarterly basis, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from an outside service provider.

Item 14 - Client Referrals and Other Compensation

Mountain View Strategic Wealth, LLC is a fee-based advisory firm, that is compensated by clients to provide investment advice. More specifically, the Firm does not receive commissions or other economic benefit or compensation from product sponsors, broker/dealers or any unrelated third-party specifically for providing investment advice.

Client Referrals

Mountain View Strategic Wealth, LLC does not currently pay referral fees to third parties for referring advisory clients to our firm; we may do so in the future. If a client is introduced to us by either a related person or an unaffiliated solicitor, we may pay that solicitor a one-time, an ongoing, or limited term referral fee based on a percentage of the referred client's advisory fee paid to Mountain View Strategic Wealth, LLC if the third-party is properly state registered and meets the requirements of SEC Rule 206(4)-1 of the Advisers Act. Any such referral fee would be paid, by written agreement, solely from Mountain View Strategic Wealth's investment management fee, which does not result in an additional cost to the client. The Firm can also receive non-compensated referrals from other industry professionals such as attorneys and/or accountants.

Industry Professionals

When it is in the best interests of the client, Mountain View Strategic Wealth, LLC can introduce the services of other professionals for certain non-investment purposes (i.e., attorneys and accountants). Introductions represent a conflict of interest because they create a relationship where the other professional has an implied obligation to introduce potential new clients to Mountain View Strategic Wealth, LLC. Clients are under no obligation to engage the services of any such professional. If the client engages any such professional, and a dispute arises, any recourse will be exclusively from and against the engaged professional.

Other Compensation

Investment adviser representatives will, on occasion, have an opportunity to attend a training event or participate in a due diligence visit where a Money Manager or Product Sponsor will cover the associated travel expenses such as airfare, hotel and meals. Training opportunities are often held at luxury resorts where entertainment as well as promotional gifts are regularly provided. Such compensation represents a conflict of interest that can influence the evaluation of the Money Manager or Product Sponsor based on factors other than the quality of services. While compensation is not directly related to the advice or services provided to a particular client, it does create a conflict of interest that can influence the selection of services based on the compensation received.

Item 15 - Custody

The Firm does not maintain physical custody of client assets. Your assets are maintained by a qualified custodian. We may be deemed to have custody when you authorize us to deduct advisory fees directly from your account. The Advisory Agreement and/or the separate agreement with any Financial Institution generally authorize Mountain View Strategic Wealth, LLC and/or the Independent Managers to debit client accounts for payment of the Firm's fees and to directly remit that those funds to the Firm in accordance with applicable custody rules. The Firm may only deduct fees with your written authorization, and the amount of any advisory fee deducted is shown on your account statement. The Financial Institutions that act as the qualified custodian for client

accounts, from which the firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Mountain View Strategic Wealth, LLC. The Firm urges you to carefully review such statements and compare this official custodial record to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Where there are differences, you should rely on the values disclosed in the custodial account statements.

In addition, as discussed in Item 13, Mountain View Strategic Wealth, LLC may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from Mountain View Strategic Wealth, LLC. Mountain View Strategic Wealth, LLC is not required to undergo a custody audit by a Public Company Accounting Oversight Board (PCAOB) accounting firm.

Item 16 - Investment Discretion

Mountain View Strategic Wealth, LLC may be given the authority to exercise discretion on behalf of clients. Mountain View Strategic Wealth, LLC is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. Mountain View Strategic Wealth, LLC is given this authority through a limited power-of-attorney included in the agreement between Mountain View Strategic Wealth, LLC and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Mountain View Strategic Wealth, LLC takes discretion over the following activities:

- The securities to be purchased or sold,
- The amount of securities to be purchased or sold,
- When transactions are made,
- The broker-dealer that executes trades (in the case of a prime brokerage relationship), and
- The Independent Managers to be hired or fired.

Item 17 - Voting Client Securities

Declination of Proxy Voting Authority

Mountain View Strategic Wealth, LLC does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm as outlined on the cover of this brochure with questions about any such issuer solicitations.

Item 18 - Financial Information

Mountain View Strategic Wealth, LLC is not required to provide audited financial statements prepared by independent public accountant because Mountain View Strategic Wealth, LLC does

not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered; the firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to its clients; and the firm has not been the subject of a bankruptcy petition at any time during the past ten years.

Business Continuity Plan

Mountain View Strategic Wealth, LLC has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

Our continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following: the ability for staff to work remotely in order to conduct business operations in a seamless fashion; electronic back-ups of records; alternative means of communications with employees, clients, critical business constituents and regulators.

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.

Cybersecurity

Mountain View Strategic Wealth, LLC strives to retain and secure all data that is utilized by our firm, our advisors, and our clients. We employ technologies that provide end-to-end security from the advisor to our on-premises server and beyond. The most vital implementation of security begins with our employees. We provide initial as well as remedial awareness training and standard operating procedures to equip our employees with best practices to avoid social engineering attacks, ransomware, and phishing schemes. We also provide our employees easy to operate tools to report such attempts to our security team for review.

Behind the scenes Mountain View Strategic Wealth, LLC utilizes anti-virus that continuously searches for and prevents threats from occurring before they start. The anti-virus updates its database and learns how to detect and prevent new and unique threats that occur to other software and businesses to stay ahead of the adversaries giving us the leading edge of protection.

The Firm employs the use of strong encryption for data at rest and data on the move.

All Firm employees are required to use and are equipped with multi-factor authentication for access to any information system. We deployed Duo mobile, Google Authenticator, VIP Access, and Microsoft Authenticator to ensure that only the authorized personnel can login to these

systems.

There is nothing more important at the Firm than maintaining and growing the trust our clients have placed in our Advisors and us. The Firm is grateful and humbled by the trust placed in us by our clients to help them achieve their financial goals and protect their personal information. The Firm works conscientiously toward this mandate. It's why we instill security into every layer of our business, from our technology to culture.

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