



**Christian Investment Advisors, Inc.  
d/b/a  
Christian Financial Advisors**

**Form ADV Part 2A – Disclosure Brochure**

**March 2024**

This Disclosure Brochure provides information about the qualifications and business practices of Christian Investment Advisors, Inc. d/b/a Christian Financial Advisors ("CFA"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (830) 609-6986.

CFA is a Registered Investment Advisor located in the State of Texas. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about CFA to assist you in determining whether to retain the Advisor.

Additional information about CFA and its advisory persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Christian Investment Advisors, Inc. d/b/a Christian Financial Advisors**  
CRD No: 165811  
672 Ridge Hill Drive, Suite A  
New Braunfels, TX 78130  
Phone: (830) 609-6986 \* Fax: (830) 620-1203  
[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

## Item 2 – Material Changes

---

Since our initial SEC filing on 02/07/2022, we have the following material changes to disclose.

Item 11 & 14 – TD Ameritrade merged with Charles Schwab, Inc. This has been reflected in these sections.

### **Future Changes**

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of CFA.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (830) 609-6986.

## Item 3 – Table of Contents

---

Item 1 – Cover Page .....	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents .....	3
Item 4 – Advisory Services.....	4
Item 5 – Fees and Compensation.....	9
Item 6 – Performance-Based Fees and Side-By-Side Management .....	12
Item 7 – Types of Clients.....	13
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	13
Item 9 – Disciplinary Information .....	17
Item 10 – Other Financial Industry Activities and Affiliations .....	17
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	19
Item 12 – Brokerage Practice.....	20
Item 13 – Review of Accounts .....	22
Item 14 – Client Referrals and Other Compensation .....	22
Item 15 – Custody .....	23
Item 16 – Investment Discretion.....	24
Item 17 – Voting Client Securities .....	24
Item 18 – Financial Information .....	24
Privacy Policy.....	25

## Item 4 – Advisory Services

---

### **Firm Information**

Christian Investment Advisors, Inc. d/b/a Christian Financial Advisors (“CFA”), is a Registered Investment Advisor located in the State of Texas, which is organized as a corporation under the laws of the State of Texas. Christian Investment Advisors was established in October 2012, as a sole proprietorship that was owned and operated by Robert N. Barber and was formerly known as “Robert N. Barber d/b/a Christian Investment Advisors”. Christian Investment Advisors, Inc. was reincorporated as a corporation in April 2017, and continues to be owned and operated by Robert N. Barber. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by CFA.

### **Advisory Services Offered**

CFA offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, and corporate clients (each referred to as a “Client”).

### **Account Portfolio Management**

CFA provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. CFA works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. CFA will then construct a portfolio internally or using third-party managers. CFA constructs portfolios consisting primarily of equities, mutual funds and/or exchange-traded funds (“ETFs”) to seek to achieve the Client’s investment goals. The Advisor also offers other investment types as necessary to meet the needs of its Clients.

CFA’s investment strategy is primarily long-term focused, but the Advisor may buy, sell, or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. CFA will construct, implement, and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

CFA strives to implement a Biblically Responsible Investing overlay into investment strategies whenever feasible. Biblically Responsible Investing works to integrate Scriptural guidelines with an investment portfolio. This method looks for companies to invest in that are making a positive impact on our society, as well as applying screening processes to avoid those that do not. If a company traded on a public exchange is publicly known to violate Biblical principles, Biblically Responsible Investing strives to stay clear from buying those companies directly through a separate managed account or indirectly through mutual funds and ETFs. CFA uses third party sources and internal processes to screen investments.

CFA evaluates and selects securities for inclusion in Client portfolios only after applying their internal due diligence process. CFA will recommend, on occasion, redistributing investment allocations to diversify the portfolio. CFA recommends, if appropriate, specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which could adversely affect the portfolio. CFA will recommend, if appropriate, selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 4

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

CFA will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

In all cases, clients have a direct and beneficial interest in their securities, rather than an undivided interest in a pool of securities. We do have limited authority to direct the Custodian to deduct our investment advisory fees from your accounts, but only with the appropriate written authorization from clients.

Where appropriate, we provide advice about any type of legacy position held in client portfolios. Typically, these are assets that are ineligible to be custodied at our primary custodian. Clients will engage us to advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance, annuity contracts, and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans).

You are advised and are expected to understand that our past performance is not a guarantee of future results. Certain market and economic risks exist that adversely affect an account's performance. This could result in capital losses in your account.

#### **Disclosure Regarding Rollover Recommendations**

A client or prospect leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) rollover to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). Our Firm may recommend an investor roll over plan assets to an IRA for which our Firm provides investment advisory services. As a result, our Firm and its representatives will earn an asset-based fee. In contrast, a recommendation that a client or prospective client leave their plan assets with their previous employer or roll over the assets to a plan sponsored by a new employer will generally result in no compensation to our Firm. Our Firm therefore has an economic incentive to encourage a client to roll plan assets into an IRA that our Firm will manage, which presents a conflict of interest. To mitigate the conflict of interest, there are various factors that our Firm will consider before recommending a rollover, including but not limited to: (i) the investment options available in the plan versus the investment options available in an IRA, (ii) fees and expenses in the plan versus the fees and expenses in an IRA, (iii) the services and responsiveness of the plan's investment professionals versus those of our Firm, (iv) protection of assets from creditors and legal judgments, (v) required minimum distributions and age considerations, and (vi) employer stock tax consequences, if any. All rollover recommendations are also reviewed by our Firm's Chief Compliance Officer in a best effort to determine that the recommendation to a client was reasonable or that the client has determined to make the rollover after being provided ample information about their options. No client is under any obligation to roll over plan assets to an IRA advised by our Firm or to engage our Firm to monitor and/or advise on the account while maintained with the client's employer. Our Firm's Chief Compliance Officer remains available to address any questions that a client or prospective client has regarding this disclosure.

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as

Christian Financial Advisors

672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130

Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 5

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

applicable, which are laws governing retirement accounts. We have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

### **Financial Planning**

CFA will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives, and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for, or financial consultation rendered to, the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence, or alter retirement savings, establish education savings and/or charitable giving programs. CFA refers Clients to an accountant, attorney, or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

**Tier Genesis Investment Management.** Financial planning services, and one-on-one client meetings available starting at \$200 per hour (1-hour minimum) for those clients with up to \$100,000 under management. Tier Genesis includes values-based investment management, personal online financial planning portal and investment risk assessment. An updated Investment Policy Statement is provided annually for review and approval to ensure alignment with risk tolerance and investment objectives. Client support is available via email, text, and live chat. Live phone support and in-person support is available at \$25 per 15-minute increment and is auto-debited from client account in arrears.

**Tier 1 Investment Management.** Financial planning services are available starting at \$200 per hour (1-hour minimum) for those clients with \$100,000 - \$300,000 under management. Tier 1 includes values-based investment management, personal online financial planning portal and investment risk assessment. In addition, clients will receive a 30-minute annual review (choice of phone or web conference).

**Tier 2 Investment Management.** Tier 2 includes all the Tier 1 services, a 1-hour annual review (choice of in-person, via phone, or web conference), and up to 3 hours are included annually for financial planning, financial advice, and investment advice per household. Discretionary investment management of portfolio strategies is separately counted from the allowable hours since it is not managed on an individual basis. Tier 2 is available to clients with \$300,000 - \$500,000 under management.

**Tier 3 Investment Management.** Includes all Tier 2 services, a 1.5-hour annual review (choice of in-person, via phone, or web conference), and up to 4.5 hours are included annually for financial planning, financial advice, and investment advice per household. Discretionary investment management of portfolio strategies is separately

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 6

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

counted from the allowable hours since it is not managed on an individual basis. Tier 3 is available to clients with \$500,000 - \$1,000,000 under management.

**Tier 4 Investment Management.** Tier 4 includes all Tier 3 services, a 1.5- to 3-hour annual review (choice of in-person, via phone, or web conference), and up to 6.5 hours are included annually for financial planning, financial advice, and investment advice per household. Discretionary investment management of portfolio strategies is separately counted from the allowable hours since it is not managed on an individual basis. Tier 4 is available to clients with \$1,000,000 - \$3,000,000 under management.

**Tier 5 Investment Management.** Tier 5 includes all Tier 4 services, a 1.5- to 3-hour annual review (choice of in-person, via phone, or web conference), and up to 10.5 hours are included annually for financial planning, financial advice, and investment advice per household. Discretionary investment management of portfolio strategies is separately counted from the allowable hours since it is not managed on an individual basis. Tier 5 is available to clients with over \$3,000,000 under management.

Collaboration with a third-party CPA and/or attorney require client authorization and their fees are not included.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to affect the transaction through the Advisor.

### **Client Account Management**

Prior to engaging CFA to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services tend to include:

- **Establishing an Investment Policy Statement** – CFA, in connection with the Client, develops a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- **Asset Allocation** – CFA will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client.
- **Portfolio Construction** – CFA will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- **Investment Management and Supervision** – CFA will provide investment management and ongoing oversight of the Client's portfolio and overall account.

### **Retirement Plan Services**

For employer-sponsored retirement plans with participant-directed investments, our firm provides its advisory services as an investment adviser as defined under Section 3(21) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA").

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 7

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)



When serving as an ERISA 3(21) investment adviser, the Plan Sponsor and Our Firm share fiduciary responsibility. The Plan Sponsor retains ultimate decision-making authority for the investments and may accept or reject the recommendations in accordance with the terms of a separate ERISA 3(21) Plan Sponsor Investment Management Agreement between Our Firm and the Plan Sponsor. Under the 3(21) agreement, Our Firm provides the following services to the Plan Sponsor:

- Screen investments and make recommendations.
- Monitor the investments and suggest replacement investments when appropriate.
- Provide a quarterly monitoring report.
- Assist the plan sponsor in developing an Investment Policy Statement (“IPS”).
- Recommend QDIA alternatives.
- Recommend non-discretionary model portfolios.

We can also be engaged to provide Plan Consulting Services. Plan Consulting Services include financial education to Plan participants, benchmarking the Plan services, education to fiduciary committee members, and monitoring the service provider. 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. We may also participate in initial enrollment meetings and periodic workshops and enrollment meetings for new participants.

When servicing as in a 3(38) fiduciary capacity, our Firm is granted full trading authority over the Plan and have the responsibility for the selection and monitoring of all investment options offered under the Plan in accordance with the investment policy statement and its underlying investment objectives and strategies for the Plan. Plan participants have the ability to exercise control over the investment selection from the plans line up of investments, and we have no authority or discretion to direct the investment of assets of any participant’s account under the Plan.

### **Consulting Services to Brokerage Customers**

CFA provides investment consulting services to certain broker/dealers’ customers (“Brokerage Customers”) who provide written consent requesting to receive the firm’s consulting services. Brokerage Customers have entered into a written advisory agreement with CFA.

### **Consulting Services**

We also provide clients with investment advice on a more-limited basis on one or more isolated areas of concern such as estate planning, real estate, retirement planning, or any other specific topic. Additionally, we provide advice on non-securities matters about the rendering of estate planning, insurance, real estate, and/or annuity advice or any other business advisory / consulting services for equity or debt investments in privately held businesses. In these cases, clients will be required to select their own investment managers, custodian, and/or insurance companies for the implementation of consulting recommendations. If client needs include brokerage and/or other financial services, we will recommend the use of one of several investment managers, brokers, banks, custodians, insurance companies, or other financial professionals (“Firms”). Consulting clients must independently evaluate these Firms before opening an account or transacting business and have the right to affect business through any firm they choose. Clients have the right to choose whether or not to follow the consulting advice provided.

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 8

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)



## Wrap Fee Programs

CFA does not engage in any wrap fee programs.

## Assets Under Management

As of December 31, 2023, CFA managed discretionary assets of \$170,611,226 and had no non-discretionary assets. The firm monitors assets under advisement of \$6,719,374.

## Item 5 – Fees and Compensation

---

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of CFA and the Client.

### Fees for Advisory Services

#### Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance based on the balance of your account at the end of the previous calendar quarter. The initial pro-rated quarterly advisory fee is charged in arrears and at the beginning of the following quarter. Investment Advisory Fees range from maximum of 1.00% to a minimum of 0.30% based on the following blended fee schedule:

Assets Under Management	Annual Rate
First \$1,000,000	1.00%
Next \$1,000,000 (\$1,000,001 - \$2,000,000)	0.75%
Next \$3,000,000 (\$2,000,001 - \$5,000,000)	0.50%
Over \$5,000,000	0.30%

At the sole discretion of the Advisor, the investment advisory fees may be negotiable. Criteria used to determine these fees include but is not limited to; current local industry comparison, size of the portfolio, complexity, and scope of the services to be rendered.

### Financial Planning

#### À la carte Financial Planning Program

Financial planning and consulting fees are collected upon booking the initial financial planning meeting. If additional time is needed then fees will be collected at the time of booking the additional meeting(s) based on the estimated time needed. The initial appointment is for a 1-hour block of time for up to \$350 per hour billed through Stripe. Followup meetings are billed for a minimum of one (1) hour at up to \$350 per hour payable in advance via Stripe. Should additional time be needed during the initial meeting, or during an additionally scheduled meeting, the time is rounded up to the nearest quarter-hour (up to \$87.50 per quarter-hour or \$350 per hour) and is then billed via Stripe after the meeting is completed. There may be charges for live phone calls or in person support depending on your service level.

#### Subscription-Based Financial Planning Program

A Subscription-based Financial Planning Program provides holistic/comprehensive financial planning for a fixed monthly fee. Clients will have three to four scheduled meetings during the Initial Year, depending on the

Christian Financial Advisors

672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130

Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 9

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

individual situation, and generally two to four scheduled meetings during Renewal Years. Meetings are conducted by telephone, online, or email, as needed, not to exceed two hours per month.

Services provided could encompass potential areas of focus, including but not limited to: identifying current and future expenses, cash flow, insurance review and needs analysis, employee benefits, retirement plan review, investment review, retirement planning, income planning strategies, social security, estate planning, long-term care planning, and tax planning.

We charge a monthly subscription-based fee of up to \$500 per month which shall be negotiable depending upon certain circumstances. Subscription-based fees shall be paid in advance, in monthly installments. With assets under management of \$1,000,000 or more, the ongoing monthly fee may be waived at the adviser's discretion. Subscription-based fees can be paid by check made payable to Christian Investment Advisors, Inc., via credit card through Stripe, via ACH through Stripe or by direct debit from the client's account at the custodian. Your financial planning agreement will detail the amount of the fee you will pay, the frequency with which the fee shall be paid and the payment method you select.

Subscription-Based fees are calculated based on the Client's(s') total income, assets, and overall complexity of their financial situation. Fees are always disclosed in advance of entering into the financial planning agreement.

### **Advance Payment of Fees and Termination**

#### **Account Portfolio Management**

CFA is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with CFA, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

#### **Unaffiliated Money Management**

In the event that a Client should wish to terminate their relationship with an unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. CFA will assist the Client with the termination and transition as appropriate.

#### **À la carte Financial Planning Program**

If an appointment is cancelled less than 24 hours before the scheduled time, a charge of \$100 will be incurred for the last-minute change and the remainder of the appointment fee will be refunded. Reschedules are allowed at no additional fee if made at least 24 hours ahead of time otherwise there will be a charge of \$100 for the last-minute change. CFA has the right to waive the last-minute fee if a valid emergency occurs. In the event of a rescheduling less than 24 hours ahead of time, the \$100 fee will be charged through Stripe. Requests to cancel or reschedule are completed via provided calendar links, phone call or email.

#### **Subscription-Based Financial Planning Program**

Either party may terminate the recurring financial planning agreement at any time by providing written notice to the other party via email or written mail.

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 10

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

In the event that a Client should wish to cancel the recurring financial planning agreement, the Client should submit a written cancellation request to [info@christianfa.com](mailto:info@christianfa.com) or mail the request to CFA, 672 Ridge Hill Drive, New Braunfels TX 78130. The request must be received no later than five (5) days before the 1<sup>st</sup> of the next month or the automatically recurring payment will be processed. If the request is received less than five (5) days before the 1<sup>st</sup> but no later than the 5<sup>th</sup> of the next month, a full refund will be issued so long as no financial planning meetings occurred during the first five (5) days of the month. The recurring payment will not recur again the following month.

## **Fee Billing**

### **Account Portfolio Management**

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with CFA at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. In addition, upon request, the Advisor will provide the Client with a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting CFA to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian. Clients should note that similar advisory services may or may not be available from other registered (or unregistered) investment advisers for similar or lower fees.

Client can also request to be billed directly for Investment Advisory Fees in lieu of the automatic account deduction.

### **Retirement Plan Services Fees**

For Retirement Plan Advisory Services compensation, we charge an advisory fee as negotiated with the Plan Sponsor and as disclosed in the Employer Sponsored Retirement Plans Consulting Agreement ("Plan Sponsor Agreement"). Our maximum advisory fees do not exceed 1.00% annually.

Typically, the billing period for these fees is paid quarterly. This fee is generally negotiable, but terms and advisory fee are agreed to in advance and acknowledged by the Plan Sponsor through the Plan Sponsor Agreement and/or Plan Provider's account agreement. Fee billing methods vary depending on the Plan Provider.

Either our Firm or the Plan Sponsor may terminate the Agreement upon 30 days written notice to the other party. The Plan Sponsor is responsible to pay for services rendered until the termination of the Agreement.

### **Consulting Services for Brokerage Customers**

CFA receives a consulting fee based on the Assets Under Management from Brokerage Customers who have provided written consent to a broker/dealer to receive the investment consulting service from CFA and have entered into a written advisory contract with CFA. The consulting fee is calculated from the Assets Under Management as of the end of a calendar quarter period multiplied by the annualized rate of 70 basis points. The

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 11

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

initial fee is paid only after the completion of one full calendar quarter period following the date of the executed agreement with broker/dealers.

### **Consulting Services**

CFA provides hourly support services for Tier Genesis clients who need support on a limited scope of work and is separate from Financial Planning and Financial Consulting services. The hourly rate for limited scope services is \$100. You will be billed in arrears for requested support by auto-debiting your investment account.

You should be aware that lower fees for comparable services may be available from other sources.

### **Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than CFA, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by CFA is separate and distinct from these custodian and execution fees.

In addition, all fees paid to CFA for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage, and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of CFA, but would not receive the services provided by CFA which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by CFA to fully understand the total fees to be paid.

### **Compensation for Sales of Securities**

CFA does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above. CFA does not receive 12(b)1 fees from mutual fund sponsors on managed assets.

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

---

CFA does not charge performance-based fees for its investment advisory services. The fees charged by CFA are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

CFA does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## Item 7 – Types of Clients

---

CFA offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, corporations, and broker/dealer. The relative percentage for each type of Client is available on CFA's Form ADV Part 1. These percentages will change over time. CFA generally imposes a minimum account size of \$5,000 for establishing a relationship. This can be waived at our sole discretion.

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

---

### Methods of Analysis

CFA primarily employs both fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from CFA is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, CFA generally employs a long-term investment strategy for its Clients, consistent with their financial goals. CFA will typically hold all or a portion of a security for more than a year but can hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, CFA will also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that can indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate.

Technical analysis is used for analyzing various economic and market trends. These trends, both short- and long-term, are used for determining specific trade entry and exit points and broad economic analysis. These trends can include put/call ratios, pricing trends, moving averages, volume, and changes in volume, among many others. Indicators used by the Advisor do not speak to the financial health of a particular issuer. Rather, indicators are used to gauge market sentiment regarding a given issue. Technical Analysis and Charting will be used primarily for the timing of a particular trade, and not security selection. More details on the Advisor's review process are included in Item 13.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203  
Page 13

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

## Investment Management Principles

CFA strives to follow these 7 investment principles that we feel are based on wisdom, years of experience and scriptural principles found in Ecclesiastes 3:1-8 and 11:2

1) We try to never allow emotions, feelings, social media, or professional doomsayers with ulterior motives dictate how to manage portfolios.

2) Our goal is to consistently monitor and actively manage using a forward-looking approach and learn from history and past lessons.

3) We strive to invest in companies with:

- Pro family values
- Produces things we all need: food, clothing, shelter, technology, healthcare, transportation, etc.
- Treats their employees well with fair pay, good health insurance benefits, a retirement plan, and time off for family
- Provides a safe working environment for their employees
- Has good employee training programs
- Compassionate towards their employees' needs
- Care about the environment and God's creation

4) We tend to avoid companies that:

- Support destructive behaviors and lifestyles
- Make money on gambling, tobacco, alcohol, pornography, and abortion
- Support organizations like Planned Parenthood that take away human lives in their most vulnerable state
- Supports the LGBTQ agenda and liberal causes

5) Once companies make it through the values screening process, we analyze:

- Income Statements: Revenue (TTM), Revenue (Quarterly YoY Growth), EPS Diluted, EPS Growth, Net Income
- Profitability: Gross Profit Margin, Profit Margin, Dividend Yield
- Price and Valuation: Market Cap: 52 Week High (Daily), 52 Week Low (Daily), PE Ratio, Price to Book Value, Debt to Equity Ratio, Free Cash Flow (Quarterly), Return on Equity
- Top Analyst Consensus Recommendations: Buy/Outperform/Hold/Underperform/Sell/Consensus Recommendations with Ratings, Price Target, and Upside Potential

6) We like to diversify among Large, Mid, and Small sized companies across Value, Growth, and Blend style boxes as well as by different sectors and countries.

7) We strive to utilize an investment strategy for each individual client's short- and long-term needs and goals. Examples include: income for retirement, emergency needs, college costs, etc. Then diversify their investment dollars across our actively managed portfolios to correspond with their goals and needs (listed):

Christian Financial Advisors

672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130

Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 14

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)



- Ultra Conservative – Immediate and short-term needs, time horizon of 1-3 years. Fixed income, low interest focused, no growth potential.
- Conservative – Intermediate needs, time horizon of 3-5 years. Interest focused, some growth potential but never more than 20% in the stock markets.
- Moderate – Intermediate to long term needs. 5-8-year time horizon. An equal emphasis on income and growth, weighted more or less in the stock markets and fixed income depending on where we feel the economy is heading.
- Growth – Long-term time horizon, 8-10 years, up to 80% in the stock market with the remainder in fixed income, also under or overweight depending on where we feel the economy is heading.
- Aggressive – Very long-term time horizon, 10 years plus. Up to 98% in the stock markets. High tolerance for risk and volatility.

### **Biblically Responsible Investing**

As a firm adhering to Biblically Responsible Investing (BRI), we believe ownership of stocks carries with it a higher level of responsibility and accountability to our faith. This means a stock owner is held accountable before God for the activities and actions the company carries out. For this reason, we seek out stocks, ETFs, and Mutual Funds that align with BRI principles in our asset allocation strategies. The key here is “ownership” whether it be directly or indirectly through a fund.

When we are building an asset allocation model, if we have choices for BRI stocks, ETFs, or Mutual Funds to address the desired asset categories, we will favor them over non-BRI options. The Equity sector has grown drastically since 1992 and this gives investors a large breadth of choices. Unfortunately, the Fixed Income area of the market has not grown at anywhere near the same rate as the Equity markets leading to fewer diversification options. Fixed Income does offer a few BRI choices but many specific asset categories are still missing. As a result, we first consider Fixed Income funds from our approved fund companies when they have the asset category needed, however, we reserve the right to choose a fund with better performance to address the specific asset class needed.

When researching investment options, potential holdings are screened using both InspireInsight.com (Inspire) and eVALUEator.com (eVALUEator). Reports from Inspire are scored with a value from -100 to 100 where 100 is considered a highly Biblically aligned company, and a company with a score of -100 lies contrary to Biblical principles. eVALUEator reports are divided into two groups: Funds and Equities. Fund screenings display a percentage the fund is invested in companies with violations and Equity screenings show specific areas of violation for the ticker including subsidiaries and affiliates.

### **Risk of Loss**

A client’s investment portfolio is affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, economic conditions, changes in laws and national and international political circumstances.

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. CFA will assist Clients in determining an appropriate strategy based on their tolerance for risk.

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 15

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)



Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account(s). CFA shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform CFA of any changes in financial condition, goals or other factors that may affect this analysis.

Our methods rely on the assumption that the underlying companies within our security allocations are accurately reviewed by the rating agencies and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investors should be aware that accounts are subject to the following risks:

- **MARKET RISK** - Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events will cause the value of securities to rise or fall. Because the value of investment portfolios will fluctuate, there is the risk that you will lose money and your investment may be worth more or less upon liquidation.
- **FOREIGN SECURITIES AND CURRENCY RISK** - Investments in international and emerging-market securities include exposure to risks such as currency fluctuations, foreign taxes and regulations, and the potential for illiquid markets and political instability.
- **CAPITALIZATION RISK** - Small-cap and mid-cap companies may be hindered as a result of limited resources or less diverse products or services. Their stocks have historically been more volatile than the stocks of larger, more established companies.
- **INTEREST RATE RISK** - In a rising rate environment, the value of fixed-income securities generally declines, and the value of equity securities may be adversely affected.
- **CREDIT RISK** - Credit risk is the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and thus impact the fund's performance.
- **EXCHANGE-TRADED FUNDS** - ETFs face market-trading risks, including the potential lack of an active market for shares, losses from trading in the secondary markets, and disruption in the creation/redemption process of the ETF. Any of these factors may lead to the fund's shares trading at either a premium or a discount to its "net asset value."
- **PERFORMANCE OF UNDERLYING MANAGERS** - We select the mutual funds and ETFs in the asset allocation portfolios. However, we depend on the manager of such funds to select individual investments in accordance with their stated investment strategy.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (830) 609-6986.**

## Item 9 – Disciplinary Information

---

**There are no legal, regulatory, or disciplinary events involving CFA.** CFA and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **165811** in the field labeled “Firm IARD/CRD Number”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. Robert N. Barber has a reportable event and can be reviewed by visiting [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), selecting the Investment Adviser Representative and entering Mr. Barber’s Individual CRD# **2279678** in the field labeled “Individual CRD Number”.

## Item 10 – Other Financial Industry Activities and Affiliations

---

### Financial Institution Consulting Services

CFA has agreement(s) with broker/dealers to provide investment consulting services to Brokerage Customers. Broker/dealers pay compensation to CFA for providing investment consulting services to Customers. This consulting arrangement does not include assuming discretionary authority over Brokerage Customers’ brokerage accounts or the monitoring of securities. These consulting services offered to Brokerage Customers can include a general review of Brokerage Customers’ investment holdings, which may or may not result in CFA’s investment adviser representative making specific securities recommendations or offering general investment advice. Brokerage Customers will execute a written advisory agreement directly with CFA.

This relationship presents conflicts of interest. Potential conflicts are mitigated by Brokerage Customers consenting to receive investment consulting services from CFA; by CFA not accepting or billing for additional compensation on broker/dealers’ Assets Under Management beyond the consulting fees disclosed in Item 5 in connection with the investment consulting services; and by CFA not engaging as, or holding itself out to the public as, a securities broker/dealer. CFA is not affiliated with any broker/dealer.

### Other Affiliations

Neither CFA nor its advisory persons are registered, or have an application pending to register, as a futures commission merchant (“FCM”), commodity pool operator (“CPO”), a commodity trading advisor (“CTA”), a registered representative of a broker-dealer (“broker-dealer”), or an associated person of any such entity.

## Insurance Agency Affiliation

Advisory persons of CFA may serve as insurance professionals, which is separate from their role with the Advisor. As an insurance professional, an advisory person receives customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This causes a potential conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation and always have a right to implement any recommendations made by the Advisor or its advisory persons. CFA only offers products that it believes are in the client's best interest.

Shawn McCammon is an investment advisor representative with CFA and an estate planning attorney with McCammon Law, P.C. Mr. McCammon offers clients legal estate planning advice or services related to this entity. The potential for income and other compensation gives him an incentive to recommend products based on the compensation received, rather than on the client's needs. To address this, disclosure is made to the client at the time purchase is made, identifying the nature of the transaction or relationship, the role to be played and any compensation to be paid by the client and/or received. It should be noted that McCammon and Murray law firm is a separate and unaffiliated entity from CFA. Mr. McCammon will at all times act in the best interest of his clients and act as a fiduciary in carrying out services to clients. It should be noted that the client is under no obligation to purchase estate planning products or advice through Mr. McCammon or his law firm McCammon Law, P.C.

Clients should be aware that the ability to receive additional compensation by our Firm and its management persons or employees creates conflicts of interest that impair the objectivity of the Firm and these individuals when making advisory recommendations. Our Firm endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps, among others to address this conflict:

- we disclose to clients the existence of material conflicts of interest, including the potential for the Firm and our employees to earn compensation from advisory clients in addition to the Firm's advisory fees;
- we disclose to clients that they have the right to decide to purchase or not purchase recommended investment products from our employees;
- we collect, maintain and document accurate, complete, and relevant client background information, including the client's financial goals, objectives, and liquidity needs;
- the Firm conducts regular reviews of each client advisory account to verify that all recommendations made to a client are in the best interest of the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we can ensure that any conflicts of interests in such activities are properly addressed;
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by the Firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need to have a reasonable and independent basis for the investment advice provided to clients.

Christian Financial Advisors

672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130

Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 18

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

## Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

---

### Code of Ethics

CFA has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with CFA. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. CFA and its personnel owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of CFA associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings, and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. CFA has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (830) 609-6986.

### Personal Trading with Material Interest

CFA allows our employees to purchase or sell the same securities that are recommended to and purchased on behalf of Clients. CFA does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. CFA does not have a material interest in any securities traded in Client accounts.

### Personal Trading in Same Securities as Clients

CFA allows our employees to purchase or sell the same securities that are recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that the trades made by our employees could impact the value of trades made on behalf of Clients or positions maintained in Client accounts. As fiduciaries, we must disclose this potential conflict and mitigate it through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which are also recommended to you.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

### Personal Trading at Same Time as Client

While CFA allows our employees to purchase or sell the same securities that are recommended to and purchased on behalf of Clients, these trades do not occur at the same time. CFA will place trades only after Client orders have been placed and filled.

At no time will CFA or any associated person of CFA transact in any security to the detriment of any Client. Monthly review of associated persons' account transactions will be conducted to ensure compliance.

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203  
Page 19

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

## Item 12 – Brokerage Practice

---

We participate in the Charles Schwab Institutional program. Charles Schwab, Inc. ("Schwab") is a member of FINRA/SIPC. Schwab is an independent and unaffiliated SEC-registered broker-dealer. Schwab offers services to independent investment advisors that include custody of securities, trade execution, clearance and settlement of transactions. Adviser receives some benefits from Schwab through its participation in the program. (Please see the disclosure under Item 14 below.)

There is no direct link between our participation in the program and the investment advice we give to our clients, although we receive economic benefits through our participation in the program that are typically not available to any other independent investment advisors participating in the program. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. Schwab may also have paid for business consulting and professional services received by some of our related persons. Some of the products and services made available by Schwab through the program may benefit us but may not benefit your account. These products or services may assist us in managing and administering your account, including accounts not maintained at Schwab. Other services made available by Schwab are intended to help us manage and further develop our business enterprise. The benefits received by our firm or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to Schwab. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. You should be aware, however, that the receipt of economic benefits by our Firm or our related persons in and of itself creates a conflict of interest and may indirectly influence our choice of Schwab for custody and brokerage services.

In the event you request us to recommend a broker/dealer custodian for execution and/or custodial services, we generally recommend your account to be maintained at Schwab. We may recommend that you establish an account(s) with Schwab to maintain custody of your assets and to effect trades for your accounts. You are under no obligation to act upon any recommendations, and if you elect to act upon any recommendations, you are under no obligation to place the transactions through any broker/dealer we recommend. Our recommendation is generally based on the broker's cost and fees, skills, reputation, dependability and compatibility with the client. You may be able to obtain lower commissions and fees from other brokers and the value of products, research and services given to us is not a factor in determining the selection of broker/dealer or the reasonableness of their commissions.

### **Aggregation and Allocation of Transactions**

We aggregate transactions if we believe that aggregation is consistent with the duty to seek best execution for our clients and is consistent with the disclosures made to clients and terms defined in the client Investment Advisory Agreement. No advisory client will be favored over any other client, and each account that participates in an aggregated order will participate at the average share price (per custodian) for all transactions in that security on a given business day.

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 20

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

We will aggregate trades for ourselves or our associated persons with your trades, providing that the following conditions are met:

- Our policy for the aggregation of transactions shall be fully disclosed separately to our existing clients (if any) and the broker/dealer(s) through which such transactions will be placed;
- We will not aggregate transactions unless we believe that aggregation is consistent with our duty to seek the best execution (which includes the duty to seek best price) for you and is consistent with the terms of our Investment Advisory Agreement with you for which trades are being aggregated;
- No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all our transactions in a given security on a given business day, with transaction costs based on each client's participation in the transaction;
- We will prepare a written statement ("Allocation Statement") specifying the participating client accounts and how to allocate the order among those clients;
- If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the allocation statement; if the order is partially filled, the accounts that did not receive the previous trade's positions should be "first in line" to receive the next allocation.

Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment and the reason for difference of allocation is explained in writing and is reviewed by our compliance officer. Our books and records will separately reflect, for each client account, the orders of which aggregated, the securities held by, and bought for that account.

We will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation; and individual advice and treatment will be accorded to each advisory client.

#### **Brokerage for Client Referrals**

Our Firm does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

#### **Trade Errors**

We have implemented procedures designed to prevent trade errors; however, 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 the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client does not receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client will be made whole, and we will absorb any loss resulting from the trade error if the error was caused by the firm. If the error is caused by the Custodian, the Custodian will be responsible for covering all trade error costs. If an investment gain results from the correcting trade, the gain will be donated to charity. We will never benefit or profit from trade errors.

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 21

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)



### **Directed Brokerage**

We do not routinely recommend, request, or require that you direct us to execute transactions through a specified broker dealer. Additionally, we typically do not permit you to direct brokerage. We place trades for your account subject to our duty to seek best execution and other fiduciary duties.

## **Item 13 – Review of Accounts**

---

### **Frequency of Reviews**

Accounts are monitored on a regular and continuous basis by the investment advisor representative of CFA with whom has the relationship with the client and the Chief Compliance Officer on a periodic basis. . Formal reviews are generally conducted by the IAR with the relationship with at least annually or more or less frequently depending on the needs of the Client.

### **Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews can be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is required to notify CFA if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client can also establish electronic access to the custodian's website so that the Client can view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor provides Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 - Client Referrals and Other Compensation**

---

Our firm neither accepts nor pays fees for client referrals.

As disclosed under Item 12 Brokerage Practices, we participate in Schwab's institutional customer program and we typically recommend Schwab to you for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our clients, although we receive economic benefits through our participation in the program that are typically not available to any other independent Investment Advisors participating in the program. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance,

Christian Financial Advisors

672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130

Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 22

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)



marketing, research, technology, and practice management products or services provided to us by third party vendors. Schwab may also have paid for business consulting and professional services received by some of our related persons. Some of the products and services made available by Schwab through the program may benefit us but may not benefit your account. These products or services may assist us in managing and administering your account, including accounts not maintained at Schwab. Other services made available by Schwab are intended to help us manage and further develop our business enterprise. The benefits received by our Firm or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to Schwab. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. You should be aware, however, that the receipt of economic benefits by our Firm or our related persons in and of itself creates a conflict of interest and may indirectly influence our choice of Schwab for custody and brokerage services.

## **Item 15 – Custody**

---

We do not have physical custody, as it applies to investment advisors. Custody has been defined by regulators as having access to or control over client funds and/or securities.

### **Deduction of Advisory Fees**

For all accounts, our Firm has the authority to have fees deducted directly from client accounts. Our Firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients, or an independent representative of the client, will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address, and the way the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. You should carefully review those statements and are urged to compare the statements against reports received from CFA. When you have questions about your account statements, you should contact CFA or the qualified custodian preparing the statement.

Please refer to Item 5 for more information about the deduction of advisor fees.

### **Standing Letters of Authorization ("SLOA")**

Our Firm is deemed to have custody of clients' funds or securities when clients have standing authorizations with their custodian to move money from a client's account to a third-party ("SLOA") and, under that SLOA, it authorizes us to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which we follow. We do not have a beneficial interest on any of the accounts we are deemed to have Custody where SLOAs are on file. In addition, account statements reflecting all activity on the account(s), are delivered directly from the qualified custodian to each client or the client's independent representative, at least quarterly. You should carefully review those statements and are urged to compare the statements against reports received from us. When you have questions about your account statements, you should contact us, your Advisor or the qualified custodian preparing the statement.

## Item 16 – Investment Discretion

---

For discretionary accounts, prior to engaging CFA to provide investment advisory services, you will enter a written Agreement with us granting the Firm the authority to supervise and direct, on an on-going basis, investments in accordance with the client's investment objective and guidelines. In addition, you will need to execute additional documents required by the Custodian to authorize and enable CFA, in its sole discretion, without prior consultation with or ratification by you, to purchase, sell, or exchange securities in and for your accounts. We are authorized, in our discretion and without prior consultation with you to: (1) buy, sell, exchange and trade any stocks, bonds or other securities or assets and (2) determine the amount of securities to be bought or sold, and (3) place orders with the custodian. Any limitations to such discretionary authority will be communicated to our Firm in writing by you, the client.

The limitations on investment and brokerage discretion held by CFA for you are:

- For discretionary accounts, we require that we be provided with authority to determine which securities and the amounts of securities to be bought or sold.
- Any limitations on this discretionary authority shall in writing as indicated on the investment advisory Agreement, Appendix B. You may change/amend these limitations as required.

## Item 17 – Voting Client Securities

---

CFA does not accept proxy voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting. We do not take action with respect to any securities or other investments that become the subject of any legal proceedings, including bankruptcies. Clients can contact our office with questions about a particular solicitation by phone at 830-609-6986.

## Item 18 – Financial Information

---

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. Finally, we have not been the subject of a bankruptcy petition at any time.

# Privacy Policy

---

March 2024

## Our Commitment to You

Christian Investment Advisors, Inc. d/b/a Christian Financial Advisors (“CFA”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor. CFA (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

CFA does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

Why you need to know?	
Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.	
What information do we collect from you?	
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals
What sources do we collect information from in addition to you?	
Custody, brokerage, and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account
How we share your information?	

Christian Financial Advisors  
672 Ridge Hill Drive, Suite A1 - New Braunfels, TX 78130  
Phone: (830) 609-6986 - Fax: (830) 620-1203

Page 25

[www.christianfinancialadvisors.com](http://www.christianfinancialadvisors.com)

RIAs do need to share personal information regarding their clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
<p><b>Servicing our Clients</b></p> <p>We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Processing transactions;</li> <li>• General account maintenance;</li> <li>• Responding to regulators or legal investigations; and</li> <li>• Credit reporting, etc.</li> </ul>	CFA may share this information.	Clients cannot limit the Advisors ability to share.
<p><b>Administrators</b></p> <p>We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>	CFA may share this information.	Clients cannot limit the Advisors ability to share.
<p><b>Marketing Purposes</b></p> <p>CFA does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where CFA or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p>	CFA does not share personal information.	Clients cannot limit the Advisors ability to share.
<p><b>Authorized Users</b></p> <p>In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.</p>	CFA does share personal information.	Clients can limit the Advisors ability to share.

<b>Information About Former Clients</b> CFA does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	CFA does not share personal information regarding former clients	Clients can limit the Advisors ability to share.
<b>How do we protect your information?</b>		
To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.		
Our employees are advised about CFA's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.		
We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.		
<b>Changes to our Privacy Policy.</b>		
We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.		
Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.		
<b>Questions:</b> You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (830) 609-6986.		