

**Part 2A Appendix 1 of Form ADV: *Wrap Fee Program Brochure***

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**Clearview Wealth Advisors, LLC WRAP Fee Program**

4/24/2020

This wrap fee program brochure provides information about the qualifications and business practices of Clearview Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (503) 400-7800 or dawn@cwa2020.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.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about Clearview Wealth Advisors, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 305737.

## **Item 2      Material Changes**

This Wrap Fee Program Brochure ("Wrap Brochure"), dated 4/24/2020, is our disclosure document prepared according to the SEC's requirements and rules.

This Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with SEC requirements, we will ensure that you receive a summary of any material changes to this and subsequent Wrap Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

Since our last filing of this Wrap Brochure, the following material changes have been made:

- We added TPAM and sub-advisory language regarding the handling of proxy voting (Item 6); and
- We clarified fees associated with the use of TPAMs or sub-advisors (Item 4).

### **Item 3      Table of Contents**

Item 1	Cover Page	1
Item 2	Material Changes	2
Item 3	Table of Contents	3
Item 4	Services Fees and Compensation	4
Item 5	Account Requirements and Types of Clients	7
Item 6	Portfolio Manager Selection and Evaluation	7
Item 7	Client Information Provided to Portfolio Managers	11
Item 8	Client Contact With Portfolio Managers	12
Item 9	Additional Information	12

## **Item 4      Services Fees and Compensation**

### **SERVICES**

Clearview Wealth Advisors, LLC is a SEC-registered investment adviser with our principal place of business located in Oregon. Clearview Wealth Advisors, LLC began conducting business in 2019.

We sponsor the Clearview Wealth Advisors, LLC WRAP Fee Program (the "Program"), a wrap fee program. A wrap fee program is an advisory program under which a specified fee or fees not based directly on transactions in the client's account is charged for advisory services, which may include portfolio management or advice concerning the selection of other investment advisers, and the execution of client transactions.

This Wrap Fee Program Brochure is limited to describing the services, fees, and other necessary information clients should consider prior to becoming a client within the Program. For a complete description of the other services and fees offered by our firm, clients should refer to our Form ADV Part 2: Firm Brochure.

You may obtain a copy of our Firm Brochure by contacting us at (503) 400-7800 or dawn@cwa2020.com.

### **SEPARATELY MANAGED ACCOUNT ("SMA") PROGRAM**

Clients participating in the Clearview Wealth Advisors, LLC WRAP Fee Program receive continual advice regarding the investment of their funds based on their individual needs. Through personal discussions in which goals and objectives based on the client's particular circumstances are established, we develop the client's personal investment policy which serves as the basis for managing the client's portfolio. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

As sponsor and investment manager of the Clearview Wealth Advisors, LLC WRAP Fee Program, we have designed this program to connect our firm's clients with professional in-house portfolio managers, third-party asset managers ("TPAM") and investment vehicles suitable for their financial circumstances and investment objectives. Our firm actively solicits advisory clients for the Program. We are also responsible for the marketing of the Program.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, growth and income, or principal protection), as well as tax considerations.

**Types of Securities:** As appropriate to the needs of the client, the following types of securities may be utilized in the client's portfolio:

- Mutual Fund shares
- Exchange Traded Fund shares

- Publicly and non-publicly traded securities
- Corporate debt securities
- Certificates of deposit
- Municipal securities
- United States government and agency securities

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

## **Fees**

**Fee:** Clients pay an asset-based fee that covers the services provided by Clearview Wealth Advisors, LLC. The maximum annual fee rate for our services in the Program is 2.50%. Subject to this maximum, the fee may be a fixed rate applicable to all assets in the account or a schedule of rates applicable to different breakpoints.

In circumstances where a TPAM or a sub-advisor is utilized to provide certain investment advisory services to a client, the TPAM or sub-advisor's fee is in addition to the client's advisory fee as stated in the client's investment management agreement with Clearview Wealth Advisors, LLC. The TPAM or sub-advisory fees may range from 0.35% to 1.25% of the clients AUM.

Clearview Wealth Advisors, LLC's advisory fees are generally not negotiable.

**How are Fees Charged?** Program fees are charged quarterly in advance. If management begins after the start of a quarter, Program fees will be prorated accordingly. When authorized by the client, fees will be debited from the account in accordance with the terms set forth in the Investment Management Agreement ("IMA").

**What services are covered by the Program fees?** The Program fees pay for our firm's advisory services to clients under the Program, administrative expenses of the Program, custody charges for clients' assets custodied at TD Ameritrade and brokerage services for Program accounts to the extent trades are conducted through TD Ameritrade.

**What services are not covered by the Program fees?** The Program fees do not cover brokerage to the extent trades are conducted through brokers or dealers other than TD Ameritrade and custody charges if client assets are custodied anywhere other than TD Ameritrade. The Program fees do not include expenses of mutual funds and electronically traded funds such as fund management fees charged to each fund's investors. As stated above, in circumstances where a TPAM or a sub-advisor is utilized to provide certain investment advisory services to a client, the TPAM or sub-advisor's fee is in addition to the client's advisory fee as stated in the client's investment management agreement with Clearview Wealth Advisors, LLC.

**Other Fees and Expenses.** Clients may incur charges for other account services provided not directly related to the execution and clearing of transactions, including, but not limited to the following: charges imposed by the client's current custodian for a transfer or termination fee before the assets are

transferred to TD Ameritrade; and/or charges necessary to liquidate incoming positions into our recommended portfolios.

**Additional Information about Program fees.** Under the Program, the participant receives our investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified Program Fee. Clients are cautioned that depending on the level of fees charged by the executing broker-dealer, and the amount of portfolio activity in the clients' account, the value of the services provided under this Program may exceed the total cost of such services had they been provided separately. In addition, the Program Fee may be higher or lower than that charged by other sponsors of comparable wrap fee programs.

## GENERAL INFORMATION

**Termination of the Advisory Relationship:** A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

**Mutual Fund / ETF Fees:** All fees paid to Clearview Wealth Advisors, LLC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

**Exchange-Traded Funds.** Shares of ETFs held in client accounts are bought and sold on an exchange and not, like mutual funds, directly from the fund itself. The price of ETF shares fluctuates in accordance with changes in the net asset value (NAV) per share, as well as in response to market supply and demand. Accordingly, ETF shares may trade at a price which differs from NAV per share of the ETF.

**ERISA Accounts:** Clearview Wealth Advisors, LLC is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income Security Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Clearview Wealth Advisors, LLC may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees.

**Advisory Fees in General:** 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.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

## **COMPENSATION**

Clearview Wealth Advisors, LLC and its investment advisor representatives receive compensation as a result of your participation in the wrap fee program. This compensation may be more than the amount we and our investment advisor representatives would receive if you paid separately for investment advice, brokerage, and other services. Accordingly, a conflict of interest exists because we and our investment advisor representatives have a financial incentive to recommend the program.

## **Item 5 Account Requirements and Types of Clients**

### **MINIMUM ACCOUNT REQUIREMENTS**

There are no minimum account requirements for participation in this wrap fee program.

The Program's portfolio managers do not impose minimum investment requirements for client participation.

Clearview Wealth Advisors, LLC WRAP Fee Program's clients must direct Clearview Wealth Advisors, LLC as to the broker dealer/custodian to be used in managing their account. As a condition for program participation, clients are required to direct us to custody their assets with and to place trades through TD Ameritrade. TD Ameritrade is an unaffiliated FINRA-member broker dealer and the clearing firm and custodian that we use for brokerage accounts. Clearview Wealth Advisors, LLC has negotiated an arrangement with TD Ameritrade to provide custodial and brokerage services as part of the Clearview Wealth Advisors, LLC WRAP Fee Program. As such, we reserve the right to decline acceptance of any client account for which the client directs the use of a broker dealer/custodian other than TD Ameritrade. Please refer to the "Other Financial Industry Activities and Affiliations" section of Item 9 for additional information.

### **TYPES OF CLIENTS**

Clearview Wealth Advisors, LLC provides advisory services in the Clearview Wealth Advisors, LLC WRAP Fee Program, where appropriate, to:

- Individuals
- High net worth individuals
- Corporations or other businesses not listed here
- Charitable Organizations

## **Item 6 Portfolio Manager Selection and Evaluation**

As previously disclosed, all participating clients' assets are managed by advisory personnel of our firm. Please refer to Item 4 for detailed disclosures regarding the portfolio management services we provide to program clients.

When we recommend separate account managers, we consider several factors including account size, risk tolerance, the opinion of each client and the investment philosophy of the portfolio manager. The recommendation of the initial portfolio manager and or the replacement of the portfolio manager will be based on a number of factors, including, but not limited to, client service, portfolio performance and customer satisfaction. The investment advisory representative responsible for the client relationship shall be responsible for ensuring that periodic portfolio performance evaluations are conducted. Each portfolio evaluated may be evaluated based on its particular circumstances. Therefore, the portfolio performance evaluations of accounts may not be conducted on a uniform or consistent basis.

Representatives of Clearview Wealth Advisors, LLC may act as the portfolio manager under a wrap fee program account. The firm and the portfolio manager receives compensation as a result of your participation in the program. This compensation may be more than the amount you would pay if you paid separately for investment advice, brokerage, and other services. Accordingly, a conflict of interest exists because we have a financial incentive to recommend the program. Related persons are subject to the same selection criteria as outside portfolio managers.

### **PERFORMANCE-BASED FEES**

Clearview Wealth Advisors, LLC does not charge performance-based fees (i.e., fees based on a share of capital gains or capital appreciation of the client's assets).

### **METHODS OF ANALYSIS**

We may use one or more of the following methods of analysis in formulating our investment advice and/or managing client assets:

***Fundamental Analysis.*** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

***Technical Analysis.*** We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

***Asset Allocation.*** Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.



A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

***Mutual Fund and/or ETF Analysis.*** We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

***Third-Party Money Manager Analysis.*** We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

***Risks for all forms of analysis.*** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, 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.

## ***INVESTMENT STRATEGIES***

We may use one or more of the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

**Long-term purchases.** We may purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

**Short-term purchases.** When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

**Margin transactions.** We may purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows us to purchase stock without selling other holdings.

**Option writing.** We may use options as an investment strategy. An option is a contract that gives persons the right to buy or sell an asset (such as 100 shares of stock) at a specific price on or before a certain date. An option, like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts that you can buy or sell:

- Buying a call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we believe that the stock will increase substantially before the option expires.
- Buying a put gives the holder the right to sell an asset at a certain price within a specific period of time. We may buy a put if we believe that the price of the stock will fall before the option expires.

We may use options to speculate on the possibility of a sharp price swing. We may also use options to "hedge" a purchase of the underlying security; in other words, we may use an option purchase to limit the potential downside of a security we have purchased for your portfolio.

We may use "covered calls", in which you sell a call option on security you own. In this strategy, you are obligated to sell if the buyer wants the securities. You receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price by a specific date.

We may use a "spread strategy", in which we purchase two or more option contracts (for example, a call option that you buy and a put option that you sell) for the same underlying security. This effectively puts you on both sides of the market, but with the ability to vary price, time and other factors.

Buying an option, "Call" or "Put" costs a premium but you have the right to exercise or not.

Selling an option, "Call" or "Put" you receive a premium payment and you have an obligation to buy or sell.

**Risk of Loss.** Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.

## **VOTING CLIENT SECURITIES**

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

In circumstances where a TPAM or a sub-advisor is utilized to provide certain investment advisory services to a client, the TPAM or sub-advisor may or may not vote proxies on behalf of clients. Please refer to the TPAM or sub-advisor's Disclosure Brochure and client agreement for more information regarding voting client securities.

## **Item 7      Client Information Provided to Portfolio Managers**

Individuals affiliated with our firm are responsible for developing an initial financial profile of the prospective client. Prior to opening an account, we assist in determining a participant's profile for the Program by obtaining from the participant appropriate information (i.e., investment objectives, risk tolerance, time horizon, and any reasonable restrictions the client wishes to impose upon the management of the account). Initial investment strategy is jointly determined based on an assessment of the information provided by the client.

While we provide the client with periodic reminders, it remains the client's responsibility to advise us of any changes to the information previously provided that might impact the ongoing suitability of any prior determined investment strategy(ies) and/or objectives. We will promptly communicate any reported changes to the client's portfolio manager.

Clearview Wealth Advisors, LLC's investment adviser representative will directly contact each wrap fee program client at least annually to verify that there has been no change in the client's financial circumstances and/or investment objectives, and determine whether the client wishes to impose any reasonable restrictions on the management of the account(s). Any such changes or requests are communicated in writing to the client's portfolio manager, who is responsible for implementing appropriate adjustments to the client's portfolio.

## **Item 8 Client Contact With Portfolio Managers**

The client's account representative is available to discuss the management and performance of the client's account and changes in the client's situation which may have an impact on the management of the client's account.

## **Item 9 Additional Information**

### **Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

### **Other Financial Industry Activities and Affiliations**

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

As previously disclosed, clients are required to direct us to custody their assets with and to place trades through TD Ameritrade as a condition for participation in the Clearview Wealth Advisors, LLC WRAP Fee Program. TD Ameritrade is an unaffiliated FINRA-member broker dealer and the clearing firm and custodian that we use for brokerage accounts. Our firm has evaluated TD Ameritrade and believes that it will provide our clients with a blend of execution services, transaction costs, and professionalism that will assist us in meeting our fiduciary obligations to clients.

In evaluating such an arrangement, the client should recognize that brokerage charges for the execution of transactions in the client's account are not negotiated by Clearview Wealth Advisors, LLC on a trade-by-trade basis, and best execution may not be achieved. In addition, as noted above in Item 4, transactions in the client's account are effected "net" (i.e., without separate transaction charges to the client) and a portion of the wrap fee is generally considered as being in lieu of transaction charges. Not all advisers require clients to direct it to use a particular broker dealer, though the sponsors of wrap fee programs typically do.

Associated persons of Clearview Wealth Advisors, LLC, in their individual and separate capacities, are agents for various insurance companies. As such, these individuals are able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

### **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Clearview Wealth Advisors, LLC and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Clearview Wealth Advisors, LLC's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [dawn@cwa2020.com](mailto:dawn@cwa2020.com), or by calling us at (503) 400-7800.

Clearview Wealth Advisors, LLC and individuals associated with our firm are prohibited from engaging in principal transactions.

Clearview Wealth Advisors, LLC and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

### **Review of Accounts**

Clearview Wealth Advisors, LLC reviews client accounts no less often than annually. More frequent reviews may be triggered in the event of changes in management style or fund closures. Account reviews are conducted by the Managers, Michael Coursey, Ron Boucher and/or Benny Won.

At least annually, we will attempt to meet with the client (either in person or over the phone) to review and update, as necessary, the client's investment profile. However, should there be any material change

in the client's personal and/or financial situation, we should be notified immediately to determine whether any review and/or revision of the client's investment profile is warranted.

All clients receive account statements from their custodian on at least a quarterly basis. Additionally, we provide clients with a written report summarizing the account activity at least annually.

### **Client Referrals and Other Compensation**

It is Clearview Wealth Advisors, LLC's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is Clearview Wealth Advisors, LLC's policy not to accept or allow our related persons to accept cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

However, from time to time, Clearview Wealth Advisors, LLC may receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite cost incurred for marketing such as advertising, publishing and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are typically made by those sponsors for whom sales have been made or it is anticipated sales will be made.

We receive an economic benefit from TD Ameritrade in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at TD Ameritrade. The availability to us of TD Ameritrade's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Clearview Wealth Advisors, LLC's associates may sell insurance products in their separate capacities as independently licensed insurance agents and earn sales commissions for insurance sales.

### **Financial Information**

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Clearview Wealth Advisors, LLC has no additional financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Clearview Wealth Advisors, LLC has not been the subject of a bankruptcy petition at any time during the past ten years.