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Form ADV Part 2A
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This 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 at 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 as an investment adviser, either with the SEC or with a state securities authority, does not imply a certain level of skill or training.

Additional information about Clearview Wealth Advisors, LLC. is also available on the SEC's website at www.adviserinfo.sec.gov. Clearview Wealth Advisors, LLC's CRD number is 305737.

Item 2 - Material Changes

Since our last annual update of this brochure (dated April 24, 2020), there have been no material changes to the firm's advisory business.

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Item 4 - Advisory Business

Clearview Wealth Advisors, LLC is a SEC-registered investment adviser with its principal place of business located in Oregon. Clearview Wealth Advisors, LLC began conducting business in 2019. Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- COURSEY WEALTH ADVISING, P.C., Member
- BOUCHER WEALTH MANAGEMENT, P.C., Member
- ARCHSTONE ENTERPRISES, P.C., Member

Michael Coursey, Ron Boucher, and Benny Won are 100% owners of Coursey Wealth Advising, P.C., Boucher Wealth Management, P.C., and Archstone Enterprises, P.C., respectively.

Clearview Wealth Advisors, LLC offers the following advisory services to our clients:

Investment Supervisory Services/Individual Portfolio Management

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

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

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

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Exchange-Traded Funds (ETFs)
- Securities traded over-the-counter
- Options and warrants
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual Funds
- United States government securities
- Interests in partnerships investing in real estate

Because some types of investments involve certain additional degrees of risk, they will only be implemented or recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity needs, and suitability.

Where appropriate and suitable for a client, we may recommend that all, or a portion of the assets under management be managed by a Third-Party Asset Manager ("TPAM") or a sub-advisor. In all discretionary accounts, except to the extent the client directs otherwise, we are authorized to use our discretion in selecting or changing a TPAM and/or sub-advisor without prior notice to the client. We monitor the performance of TPAMs or sub-advisors selected to manage client assets. Client may be required to execute a limited power of attorney with a TPAM or sub-advisor selected by Clearview Wealth Advisors, LLC. Clients should refer to the selected registered investment adviser's Firm Brochure or other disclosure document for a full description of the services offered.

Financial Planning

We provide financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known factors to assess future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information, and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan can address any or all the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current, and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid, and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, investment objectives, liquidity needs and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning. Typically, the financial plan is presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

Consulting Services

Clients can also receive investment advice on a more focused basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We also provide specific consultation and administrative services regarding investment and financial concerns of the client. Consulting recommendations are not limited to any specific

product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

Financial Institution Consulting Services

We provide investment consulting services to some customers of certain broker-dealers (“Brokerage Customers”) who provide written consent requesting to receive our consulting services. Brokerage Customers have entered into a written advisory agreement with Clearview Wealth Advisors, LLC.

Clearview Wealth Advisors participates in a wrap-fee program that it sponsors. How we manage your investments and portfolios in the wrap-free program is not different than accounts not in a wrap-fee program. We use many of the same methodologies in selecting investments. However, a wrap-fee program will not generally be utilized if an account is under non-discretionary management.

As of March 1, 2021, Clearview Wealth Advisors had approximately \$225,943,000 in discretionary assets under management and \$6,326,000 non-discretionary assets under management.

Item 5 - Fees and Compensation

We are compensated for our investment advisory services by means of advisory fees, which can be based on a percentage of assets under management, fixed fees, or hourly fees. This section describes our fee structure and how we are compensated. So that you understand how our fee structures work, we discuss each of our investment advisory services and their corresponding fees.

Although Clearview Wealth Advisors, LLC has established the following fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

In circumstances where a TPAM or a sub-advisor is utilized to provide certain investment advisory services to a client, TPAM or sub-advisory fees are handled differently, depending upon the TPAM or sub-advisor utilized.

Investment Supervisory Services/Individual Portfolio Management

Our annual fees for Investment Supervisory Services are based upon a percentage of assets under management and generally range from 0% to 2.5%.

Fees may be charged on a fixed percentage basis or on a tiered basis. The fixed percentage fees range from 0% to 2.5%. On a tiered basis, the annualized fee Investment Supervisory Services/Individual Portfolio Management are charged as a percentage of assets under management, according to the following schedule:

Assets Under Management	Annualized Fee
\$0-\$100k	1.50%
\$100k-\$500k	1.15%
\$500k-\$2.5MM	1.00%
\$2.5MM-\$5MM	0.85%
\$5MM +	0.70%

When utilizing a TPAM or sub-advisor to provide certain advisory services to a client, the annual fee shown in the above fee table can increase by as much as 1%.

Our fees are billed quarterly, in advance, at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Client Services Agreement. In certain cases, fees will be billed in arrears. Please refer to your specific agreement for terms and fees.

Financial Planning

Clearview Wealth Advisors, LLC's Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering a contract with any client.

Our Financial Planning fees may be calculated and charged on an hourly basis up to \$1,000 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship. The client is billed quarterly in arrears based on actual hours accrued.

Our Financial Planning fees may also be calculated and charged using a fixed fee up to \$10,000 per year depending on the specific arrangement reached with the client. We may request a retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed \$1,200 for work that will not be completed within six months. The balance is due upon completion of the plan.

Consulting Services

Clearview Wealth Advisors, LLC's Consulting Services fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering a contract with any client.

Our Consulting Services fees are calculated and charged on either an hourly basis or fixed fee basis. The hourly fee can be up to \$1,000 per hour and the fixed fee can be up to \$10,000. An estimate for the total hours is determined at the start of the advisory relationship. The client is billed quarterly in arrears based on actual hours accrued.

Financial Institution Consulting Services

We receive a consulting fee based on assets under management from brokerage customers who have provided written consent to a broker-dealer to receive this investment consulting service from us and have entered a written advisory contract with Clearview Wealth Advisors, LLC. The consulting fee is calculated based on assets under management as of the end of a calendar quarter period multiplied by the annualized rate ranging from .25% to 1%. The initial fee is paid only after the completion of one full calendar quarter period following the date of the executed agreement with the broker-dealer.

General Information

Advisory agreements may be terminated 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.

Fees paid by clients 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 directly invest in a mutual fund 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. If we recommend mutual funds, we will recommend "no-load" funds with no initial or deferred sales charge.

Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the independent advisers, which may be charged as part of a wrap fee arrangement. In a wrap fee arrangement, clients pay a single fee for advisory, brokerage and custodial services. Client's portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer or investment adviser, the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be charged to clients.

In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians, administrators, broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transaction for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information. Additionally, there may be incidental fees and charges imposed by the custodian for services such as overnight delivery of documents or checks, administrative fees, federal fund wires and other services provided by the custodian.

Pre-existing advisory clients are subject to Clearview Wealth Advisors, LLC's advisory fees in effect at the time the client entered the advisory relationship. Therefore, advisory fees will differ among clients.

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, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Clearview Wealth Advisors, LLC's advisory fees.

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. Certain clients whose managed assets are not custodied at TD Ameritrade may be charged fees in arrears for investment supervisory services depending on the platform provider.

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

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

Clearview Wealth Advisors does not accept or charge performance-based fees or any fees based on a share of capital gains or on capital appreciation.

Item 7 - Types of Clients

Clearview Wealth Advisors, LLC provides advisory services to individuals, households, corporations, charitable organizations, and businesses.

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

Methods of Analysis

We use 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 generally 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 managers of the mutual fund or ETF in an attempt to determine if the managers have 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 other 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 use 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 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 will 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 the buyer the right, but not the obligation, to buy or sell an asset (such as 100 shares of stock) at a specific price on or before a certain date. An option, just 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:

- 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 believe that the stock will increase substantially before the option expires or sell a call on a security you hold to collect a premium and take on an obligation to sell your stock (100 shares) at a specific price.
- A put gives us the holder the right to sell an asset at a certain price within a specific period of time. We will buy a put if we believe that the price of the stock might fall before the option expires.

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

We use "covered calls", in which we sell an option on security you own. In this strategy, 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.

We 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 a call or put allows the buyer to have the right but not obligation to exercise the option contract. Selling a Call or Put makes the seller obligated to accept the terms of the contract.

Risk of Loss. Securities investments are not guaranteed, and you may lose money on your investments. Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.

Investors face the following investment risks:

Interest-rate Risk - Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Market Risk - The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances. For example, political, economic, and social conditions may trigger market events.

Inflation Risk - When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk - Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk - This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.

Business Risk - These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

Liquidity Risk - Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Financial Risk - Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Mutual Fund Securities

Investing in mutual funds carries inherent risk. The major risks of investing in a mutual fund include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive growth, the amount of individual company diversification, the type and amount of industry diversification, and the type and amount of sector diversification within specific industries. In addition, mutual funds tend to be tax inefficient and therefore investors may pay capital gains taxes on fund investments while not having yet sold the fund.

Exchange-Traded Funds ("ETFs")

ETFs are investment companies whose shares are bought and sold on a securities exchange. An ETF holds a portfolio of securities designed to track a specific market segment or index. The funds could purchase an ETF to gain exposure to a portion of the U.S. or foreign market. The funds, as a shareholder of another investment company, will bear their pro-rata portion of the other investment company's advisory fee and other expenses, in addition to their own expenses. Investing in ETFs involves risk. Specifically, ETFs, depending on the underlying portfolio and its size, can have wide price (bid and ask) spreads, thus diluting or negating any upward price movement of the ETF or enhancing any downward price movement. Also, ETFs require more frequent portfolio reporting by regulators and are thereby more susceptible to actions by hedge funds that could have a negative impact on the price of the ETF. Certain ETFs may employ leverage, which creates additional volatility and price risk depending on the amount of leverage utilized, the collateral and the liquidity of the supporting collateral. Further, the use of leverage (i.e., employ the use of margin) generally results in additional interest costs to the ETF. Certain ETFs are highly leveraged and therefore have additional volatility and liquidity risk. Volatility and liquidity can severely and negatively impact the

price of the ETF's underlying portfolio securities, thereby causing significant price fluctuations of the ETF.

Equity Securities

Investing in individual companies involves inherent risk. The major risks relate to the company's capitalization, quality of the company's management, quality and cost of the company's services, the company's ability to manage costs, efficiencies in the manufacturing or service delivery process, management of litigation risk, and the company's ability to create shareholder value (i.e., increase the value of the company's stock price). Foreign securities, in addition to the general risks of equity securities, have geopolitical risk, financial transparency risk, currency risk, regulatory risk and liquidity risk.

Fixed Income Securities

Fixed income securities carry additional risks than those of equity securities described above. These risks include the company's ability to retire its debt at maturity, the current interest rate environment, the coupon interest rate promised to bondholders, legal constraints, jurisdictional risk (U.S or foreign) and currency risk. If bonds have maturities of 10 years or greater, they will likely have greater price swings when interest rates move up or down. The shorter the maturity the less volatile the price swings. Foreign bonds have liquidity and currency risk.

Item 9 - 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.

Item 10 - Other Financial Industry Activities and Affiliations

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

However, associated persons of Clearview Wealth Advisors, LLC, in their individual and separate capacities, are agents for various insurance companies. As such, these individuals can 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.

In “Item 4 – Advisory Business,” we described our Financial Institution Consulting Services. This entails having an agreement with broker-dealers to provide investment consulting services to some of their brokerage customers. These broker-dealers pay compensation to us for providing investment consulting services to these brokerage customers. This consulting arrangement does not include assuming discretionary authority over these brokerage customers’ accounts or the monitoring of securities. The consulting services offered to these brokerage customers may include a general review of their investment holdings, which may or may not result in Clearview Wealth Advisors’ investment adviser representative making specific securities recommendations or offering general investment advice. These brokerage customers execute a written advisory agreement directly with us.

This relationship presents conflicts of interest. Potential conflicts are mitigated by the consent of these brokerage customers to receive investment consulting services from us, Clearview Wealth Advisors not accepting or billing for additional compensation on the broker-dealer’s assets under management beyond the consulting fees disclosed in Item 5 in connection with the investment consulting services and by Clearview Wealth Advisors not engaging as or holding itself out to the public as a securities broker-dealer. We are not affiliated with any broker-dealer, including those broker-dealers with whom we have this arrangement.

Item 11 - Code of Ethics

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. Our firm and its 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. Our code also provides for oversight, enforcement, and recordkeeping provisions.

Our 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 access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

Our Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of our employees will not interfere with making decisions in the best interest of advisory clients and 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 securities for their personal accounts identical to or different from those recommended to our clients.

A copy of our Code of Ethics is available to our advisory clients and prospective clients upon request.

Item 12 - Brokerage Practices

Clearview Wealth Advisors, LLC does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank.

Clearview Wealth Advisors, LLC recommends that our clients use TD Ameritrade Inc., Member FINRA/SIPC (“TD Ameritrade”), an independent and unaffiliated SEC-registered broker-dealer and FINRA member, as the qualified custodian. We are independently owned and operated and are not affiliated with TD Ameritrade. TD Ameritrade will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use TD Ameritrade as custodian/broker, you will decide whether to do so and will open your account with TD Ameritrade by entering into an account agreement directly with them. We do not open the account

for you, although we may assist you in doing so. Even though your account is maintained at TD Ameritrade, we can still use other brokers to execute trades for your account.

Clearview Wealth Advisors, LLC will arrange for the execution of securities transactions for client accounts through brokers or dealers that we reasonably believe will provide best execution. In selecting a broker or dealer, Clearview Wealth Advisors, LLC will comply with its fiduciary duty to seek best execution will consider, among other things, the broker or dealer's execution capabilities, competitive commission rates, reputation, and access to the markets for the securities being traded. For discretionary clients, Clearview Wealth Advisors, LLC requires these clients to provide us with written authority to determine the broker dealer to use for these transactions (See Item 16 Investment Discretion).

Clearview Wealth Advisors, LLC will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block.

Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. Clearview Wealth Advisors, LLC will typically aggregate trades among clients whose accounts can be traded at a given broker. Clearview Wealth Advisors, LLC's block trading policy and procedures are as follows:

- 1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with Clearview Wealth Advisors, LLC, or our firm's order allocation policy.
- 2) The trading desk in concert with the portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
- 3) The portfolio manager must reasonably believe that the order aggregation will benefit, and will enable Clearview Wealth Advisors, LLC to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a "20-20 hindsight" perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.
- 4) Prior to entry of an aggregated order, a written order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.

5) If the order cannot be executed in full at the same price or time, the securities purchased or sold by the close of each business day must be allocated pro rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.

6) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order and must share in the commissions on a pro rata basis in proportion to the client's participation. Under the client's agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client.

7) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.

8) Clearview Wealth Advisors, LLC's client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for, that account.

9) Funds and securities for aggregated orders are clearly identified on Clearview Wealth Advisors, LLC's records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.

10) No client or account will be favored over another.

Clearview Wealth Advisors, LLC participates in the TD Ameritrade Institutional Program. TD Ameritrade Institutional is a division of TD Ameritrade. TD Ameritrade offers services to independent investment advisers which include custody of securities, trade execution, clearance, and settlement of transactions. Clearview Wealth Advisors, LLC receives some benefits from TD Ameritrade through our participation in the program.

Clearview Wealth Advisors, LLC participates in TD Ameritrade's Institutional customer program and we recommend TD Ameritrade to our clients for custody and brokerage services. Although we receive economic benefits through our participation in the program that are not available to TD Ameritrade retail investors, there is no direct link between our firm's participation in the program and the investment advice we give to our clients.

These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving adviser 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 Clearview Wealth Advisors, LLC by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by Clearview Wealth Advisors, LLC's related persons and may also pay or reimburse expenses (including travel, lodging, meals and entertainment expenses for Clearview Wealth Advisors, LLC's personnel to attend conferences or meetings relating to the program or to TD Ameritrade's adviser custody and brokerage services generally.

Some of the products and services made available by TD Ameritrade through the program may benefit Clearview Wealth Advisors, LLC but may not benefit our client accounts. These products or services may assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by Clearview Wealth Advisors, LLC, or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by Clearview Wealth Advisors, LLC, or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our recommendation of TD Ameritrade for custody and brokerage services.

Clearview Wealth Advisors, LLC's receipt of any such services does not diminish our duty to act in the best interests of our clients, including seeking best execution of trades for client accounts. Instead of allowing us to select brokers or dealers for a client's account, clients may direct us in writing to use a particular broker or dealer to execute all transactions for the client's account. In that case, you will negotiate terms and arrangements for the account with that broker or dealer, and we will not seek better execution services or prices from other brokers or dealers or be able to "batch" client transactions for execution through other brokers or dealers with orders for other accounts managed by Adviser. As a result, you may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for your account than would otherwise be the case.

Item 13 - Review of Accounts

While the underlying securities within Investment Supervisory Services/Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least annually. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in factors such as the client's individual circumstances, market conditions and economic or political events.

These accounts are reviewed as a team by Michael Coursey, Ron Boucher and Benny Won.

In addition to the monthly/quarterly statements and confirmations of transactions that clients receive from their custodian, we provide reports summarizing account performance, balances and holdings when requested by the client.

Financial Planning clients will receive a financial plan acceptable to the client. While reviews may occur at different stages depending on the nature and terms of the specific engagement, no formal reviews or subsequent reports will be conducted for Financial Planning clients unless otherwise requested or contracted.

While reviews may occur at different stages depending on the nature and terms of the specific engagement, no formal reviews will be conducted for Consulting clients unless requested or contracted. Such reviews will be conducted by the client's primary investment adviser representative. Due to the nature of this service, clients will not receive reports.

Item 14 - Client Referrals and Other Compensation

We have entered into a written agreement with SmartAsset, a SEC-registered investment adviser, to provide potential clients to us. We pay a monthly referral fee that is not contingent on you becoming a client of Clearview Wealth Advisors. The advisory fee you pay to us is not changed or affected by this arrangement with SmartAsset. Neither the firm nor any of our investment adviser representatives are affiliated with SmartAsset.

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.

Additionally, 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. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of TD Ameritrade’s products and services is not based on us giving particular investment advice or buying 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 (See Item 10).

Item 15 - Custody

We do not accept custody of any securities or investment assets. These will be held by a custodian. We do not prepare or send any account statements. Account statements are sent directly to clients by the custodian of the assets.

In Item 5 (“Fees and Compensation”), we disclosed that we directly debit advisory fees from client accounts. As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. Quarterly, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should directly contact us if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we may send account statements directly to our clients upon request. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings, and values are correct and current.

Item 16 - Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell;
- determine the broker-dealer to be used for a purchase or sale of securities; and/or
- determine the amount of the security to buy or sell.

Clients give us discretionary authority when they sign an investment advisory agreement with us.

Clients may also grant Clearview Wealth Advisors, LLC non-discretionary authority to execute investment recommendations. Non-discretionary authority requires the firm to obtain your consent to each specific transaction prior to executing the investment recommendation.

Item 17 - 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 directing the way proxies solicited by issuers of securities beneficially owned by the client shall be voted and 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 18 - Financial Information

Under no circumstances do we require or solicit payment of fees more than \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

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. We have no financial commitments that would impair our ability to meet contractual and fiduciary commitments to clients.

Neither Clearview Wealth Advisors, LLC nor any of its principals were the subject of a bankruptcy petition within the past ten years.