



## **Cassia Capital Partners LLC**

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

**Effective: January 28, 2021**

This Form ADV2A ("Disclosure Brochure") provides information about the qualifications and business practices of Cassia Capital Partners LLC ("Cassia" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (336) 723-4585 or by email at [info@cassiacapitalpartners.com](mailto:info@cassiacapitalpartners.com).

Cassia is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the 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 Cassia to assist you in determining whether to retain the Advisor.

Additional information about Cassia and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or firm CRD# 159911.

**Cassia Capital Partners LLC**  
**1144 West Fourth Street, Suite 200, Winston Salem, NC 27101**  
**Phone: (336) 723-4585 | [www.cassiacapitalpartners.com](http://www.cassiacapitalpartners.com)**

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of Cassia. For convenience, the Advisor has combined these documents into a single disclosure document.

Cassia believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Cassia encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has amended Item 17 as it now may vote proxies for client accounts. Please see Item 17 for additional details.
- The Advisor has amended Item 15 to amend the language regarding money movement.

### Future Changes

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

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) by searching with the Advisor's firm name or firm CRD# 159911. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (336) 723-4585 or by email at [info@cassiacapitalpartners.com](mailto:info@cassiacapitalpartners.com).

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Cassia Capital Partners LLC (“Cassia” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Delaware. Cassia was founded in October 2011 and is owned and operated by James R. Helvey III (Managing Partner) and Charles D. Barham III (Managing Partner and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Cassia.

### **B. Advisory Services Offered**

Cassia offers investment management, financial consulting and related advisory services to individuals, high net worth individuals, trusts, estates, endowments, foundations, and business entities (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As such, each recommendation made as part of the advisory services is based on the belief that the recommendation is in the Client's best interest. Cassia's fiduciary commitment to each Client is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading. The details of these services are described in the paragraphs below:

#### Portfolio Management Services

Cassia provides customized discretionary investment management solutions for its Clients. Cassia 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 strategy. Cassia will then construct a portfolio, consisting of exchange-traded funds (“ETFs”), mutual funds, hedge funds and private equity investments to achieve the Client's investment goals. The Advisor may also utilize individual stocks and bonds to meet the needs of its Clients.

Cassia's discretionary investment management strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Cassia 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.

Cassia evaluates and selects securities funds for inclusion in Client portfolios only after applying their internal due diligence process. Cassia may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Cassia may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. Cassia may recommend 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 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.

Cassia will provide investment advisory services and portfolio management services and will not provide securities custody or other administrative services. At no time will Cassia accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their account[s] at the Custodian, pursuant to the Client investment advisory agreement. For additional information, please see Item 12 – Brokerage Practices.

#### Advisory-Only Investment Services

Cassia provides customized advisory-only investment solutions for Institutional Clients. An Institutional Client

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may engage Cassia through an advisory-only investment advisory agreement. Cassia, serves as a risk manager for the Institutional Client, and provide the following services:

- (a) Monthly performance reports (including appropriate benchmark comparisons);
- (b) Ad-hoc performance reporting (e.g., including, without limitation, daily summary reports);
- (c) Quarterly asset allocation reports; and
- (d) Asset allocation recommendations.

#### Sub-Advisory Services

Cassia provides discretionary investment management services to Independent Advisors and their clients. Cassia will manage Clients' designated portfolios according to Cassia model strategies chosen and specified by the Independent Advisors and their clients. As part of its portfolio management services, Cassia provides periodic portfolio rebalancing designed to keep portfolios consistent with Cassia's Model Strategies. In addition, upon request by the Independent Advisor, Cassia will provide reports regarding the model strategies and may also be available to meet with Clients on a periodic basis.

#### Consulting Services

Cassia will typically provide a variety of financial consulting services for Clients, pursuant to a written consulting agreement. Consulting services are customized to the unique needs of each Client. Services are offered in one or more areas of a Client's financial situation, depending on their goals and objectives.

Generally, such consulting services will involve a financial analysis or rendering a financial consultation for Clients. These consulting services may encompass one or more areas of need, including, but not limited to investment review, portfolio construction, retirement planning, estate planning, personal savings, education savings, review of non-security assets and other areas of a Client's financial situation, as needed.

Cassia may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain engagements, the Advisor may or may not provide a written report for these services, depending on the needs of the Client and the terms of the consulting agreement.

Recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. 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 implement the transaction through the Advisor.

### **C. Client Account Management**

Prior to engaging Cassia to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Cassia, in connection with the Client, will develop an investment strategy targeted to achieve the Client's investment goals and objectives.
- Asset Allocation – Cassia 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 – Cassia will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Cassia will provide investment management and ongoing oversight of the Client's investment portfolio.

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#### **D. Wrap Fee Programs**

Cassia does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Cassia.

#### **E. Assets Under Management**

As December 31, 2020, Cassia manages \$132,884,742 in discretionary assets. Clients may request more current information at any time by contacting the Advisor.

In addition, as of December 31, 2020, Cassia advises \$146,504,369 in assets to institutional Clients as part of the "Advisory-Only Investment Services" as noted under Item 4B.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of Cassia and the Client.

#### **A. Fees for Advisory Services**

##### Portfolio Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees range from 1.00% to 0.60% based on the following schedule:

<b>Assets Under Management</b>	<b>Annual Rate</b>
Up to \$1,000,000	1.00%
Next \$2,000,000	0.75%
Over \$3,000,000	0.60%

Certain Clients are offered a flat fixed rate that ranges up to 1.00%, paid quarterly, in advance of each calendar quarter. The investment advisory fee in the first quarter of service is prorated to the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. Certain existing Clients may have a fee schedule that differs from above. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Cassia will be independently valued by the Custodian. Cassia will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

##### Consulting Services

Cassia offers financial consulting services at an hourly rate of \$325 or based on a fixed fee per engagement, payable in arrears. The fixed rate is based on the expected number of hours to complete the engagement at the negotiated hourly rate. Fees may be negotiable depending on the nature and complexity of the services requested. An estimate for total hours and/or costs and the scope of services to be completed will be provided to the Client prior to engaging for these services.

##### Advisory-Only Investment Services

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For Institutional Clients who have Cassia advise their accounts on an Advisory-Only basis will be charged a quarterly fee of up to \$10,000. Fees may be negotiable at the sole discretion of the Advisor.

#### Sub-Advisory Services

Sub-Advisory fees are paid quarterly in advance or in arrears pursuant to the terms of the agreement between Cassia and the Independent Advisor. Cassias fees are based on the following schedule:

Assets Under Management	Annual Rate
Up to \$5,000,000	0.40%
Over \$5,000,000	0.35%

### **B. Fee Billing**

#### Portfolio Management Services/Advisory-Only Investment Services/Sub-Advisory Services

Investment advisory fees will be calculated by the Advisor and deducted from the Client account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] 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 Cassia at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory 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 advisory fees to be deducted by directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Consulting Services

Consulting fees are invoiced by the Advisor and are due upon receipt of the agreed upon deliverable[s].

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Cassia, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The investment advisory fee charged by Cassia is separate and distinct from these custody and execution fees.

In addition, all fees paid to Cassia for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs 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 may be able to invest in these products directly, without the services of Cassia, but would not receive the services provided by Cassia 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 Cassia to fully understand the total fees to be paid.

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

#### Portfolio Management Services/Advisory-Only Investment Services

Cassia is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may request to terminate their investment advisory agreement with Cassia, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Advisor will refund any unearned, prepaid

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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 prior consent.

#### Consulting Services

Cassia is compensated for its services upon completion of the engagement deliverable[s]. Either party may terminate a consulting services agreement, at any time, by providing advance written notice to the other party. In addition, the Client may also terminate the agreement within five (5) business days of signing the Advisor's consulting services agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Any unearned, prepaid fees will be promptly refunded to the Client.

#### Sub-Advisory Services

Cassia is compensated for its services in advance of the calendar-quarter in which investment sub-advisory services are rendered. Either party may request to terminate the advisory agreement with Cassia, at any time, by providing advance written notice to the Independent Advisor. 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.

### **E. Compensation for Sales of Securities**

Cassia 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.

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

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

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Cassia offers investment advisory services to individuals, high net worth individuals, trusts, estates, endowments, foundations, and business entities. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Cassia generally imposes a minimum relationship size of \$250,000 for establishing an advisory relationship. The minimum relationship size may be waived at the sole discretion of the Advisor.

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

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### **A. Methods of Analysis**

Cassia primarily employs a fundamental analysis method in developing investment strategies for its Clients, but may also employ cyclical analysis and other risk-based methods in developing investment decisions. Research and analysis from Cassia are 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.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being

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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. More details on the Advisor's review process are included in Item 13 – Review of Accounts.

As noted above, Cassia generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Cassia will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Cassia may 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.

## **B. Risk of Loss**

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. Cassia will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help 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 these methods of 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. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

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]. 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.

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. The following are some of the risks associated with the Advisor's investment strategies:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

**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.**

### **Item 9 – Disciplinary Information**

**There are no legal, regulatory or disciplinary events involving Cassia or its Advisory Persons.** Cassia and its Advisory Persons value the trust you place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or firm CRD# 159911.

### **Item 10 – Other Financial Industry Activities and Affiliations**

#### Board of Directors – James Helvey - Unpaid

Mr. Helvey serves on the Board of Directors for Wake Forest University Health Sciences Investment Committee and Verger Capital Management. Verger Capital Management is wholly owned by Wake Forest University. Such activity is not uncommon in the financial services industry and such relationships are disclosed to investors. For his role with these companies, Mr. Helvey is required to prepare for and attend regular Director's meetings.

#### Board of Directors – James Helvey - Paid

Mr. Helvey serves as a member of the Board of Directors of the Coca-Cola Bottling Co. Consolidated, the Computer Task Group, Inc. and Piedmont Federal Savings Bank where he is compensated for these services. For his role with these companies, Mr. Helvey is required to prepare for and attend regular Director's meetings.

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

#### **A. Code of Ethics**

Cassia has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Cassia ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding Cassia's duties to Clients. Cassia and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Cassia's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (336) 723-4585 or via email at [info@cassiacapitalpartners.com](mailto:info@cassiacapitalpartners.com).

#### **B. Personal Trading with Material Interest**

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Cassia allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Cassia does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advice an investment company. Cassia does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

Cassia allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to you and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Cassia have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Cassia requiring reporting of personal securities trades by its Supervised Persons pursuant to its Code of Ethics. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information. The Advisor has an interest or position in certain securities, which may also be recommended to Clients.

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.

### **D. Personal Trading at Same Time as Client**

While Cassia allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, these trades do not occur at the same time. Cassia will place trades only after Client orders have been placed and filled. **At no time, will Cassia or any Supervised Persons of Cassia, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

Cassia does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Cassia to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Cassia does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Cassia does not exercise discretion over the selection of the Custodian, it will recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Cassia. In such instance, the Advisor may not be able to deliver the same services to Client as provided to other Clients. Cassia may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, the Custodian's reputation and/or the location of the Custodian's offices, and/or the services provided to the Advisor. Cassia will typically recommend that Clients establish their account[s] at Pershing LLC ("Pershing"), a FINRA-registered broker-dealer and member SIPC. Pershing will serve as the Client's "qualified custodian". Cassia maintains an institutional relationship with Pershing, whereby the Advisor receives economic benefits from Pershing. Please see Item 14 below.

Cassia may receive from Pershing, without cost to Cassia, computer software and related systems support that allows Cassia to better monitor Client accounts. Cassia may receive software and related support without cost

because Cassia renders investment management services to Clients that maintain assets on these institutional platforms. The software and related systems support may benefit Cassia, but not its Clients directly. In fulfilling its duties to its Clients, Cassia endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that Cassia's receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence Cassia's choice of Custodian over another custodian that does not furnish similar software, systems support, or services.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Cassia does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - Cassia does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Cassia will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Cassia will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

#### **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Cassia will execute its transactions through the Custodian as directed by the Client. Cassia may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Clients' accounts.

### **Item 13 – Review of Accounts**

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#### **A. Frequency of Reviews**

Securities in a Client account[s] are monitored on a regular and continuous basis by James Helvey or Charles Barham, Managing Partners of Cassia. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

#### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A. above, each Client account shall be reviewed at least annually. Reviews may 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[s]. The Client is encouraged to notify Cassia 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.

## **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may 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 may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by Cassia**

Cassia is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. Cassia does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party. Cassia may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Cassia may receive referrals of new Clients from a third-party.

#### Participation in Institutional Advisor Platform

Cassia has established an institutional relationship with Pershing to assist the Advisor in managing Client account[s]. Access to the Custodian Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Pershing. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Pershing: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information. Details of this custodian relationship are included in Item 12 – Brokerage Practices.

### **B. Client Referrals from Solicitors**

Cassia does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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Cassia does not accept or maintain custody of any Client account[s], except for the authorized deduction of the advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Cassia to utilize the Custodian for the Client's security transactions. Cassia encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

## **Item 16 – Investment Discretion**

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Cassia generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Cassia. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to

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such authority. All discretionary trades made by Cassia will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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Cassia may accept the authority to vote Client's securities (i.e., proxies) on their behalf. When Cassia accepts such responsibility, it will cast proxy votes in a manner it believes is consistent with the best interest of its Clients. At any time Clients may contact Cassia to request information about how the Advisor voted proxies for that Client's securities. A brief summary of Cassia's proxy voting policies and procedures is as follows:

The Advisor has engaged Broadridge, a third-party, independent proxy advisory firm, to provide it with ProxyEdge which provides research, analysis, and recommendations on the various proxy proposals for the client securities that Cassia manages with the aim of maximizing shareholder value. In engaging ProxyEdge for that purpose, Cassia has reviewed ProxyEdge's Proxy Paper Guidelines for the current proxy voting season and has approved the summary of ProxyEdge's positions on the voting positions it recommends for the types of proposals most frequently presented, including: election and composition of directors; financial reporting; compensation of management and directors; corporate governance structure and anti-takeover measures; and environmental and social risks to operations. Cassia is in agreement with the approach ProxyEdge has set forth in its current Proxy Paper Guidelines for voting proxies. Although Cassia, based on its approval of the positions in the Proxy Paper Guidelines, expects to vote proxies according to ProxyEdge's recommendations, certain issues may need to be considered on a case-by-case basis due to the diverse and continually evolving nature of corporate governance issues. If such cases should arise, then Cassia will devote appropriate time and resources to consider those issues.

Where Cassia is responsible for voting proxies on behalf of a Client, the Client cannot direct the Firm's vote on a particular solicitation. The Client, however, can revoke Cassia's authority to vote proxies. In situations where there may be a conflict of interest in the voting of proxies due to business or personal relationships that Cassia maintains with persons having an interest in the outcome of certain votes, the Advisor will take appropriate steps, whether by following ProxyEdge's third-party recommendation or otherwise, to ensure that proxy voting decisions are made in what it believes is the best interest of its Clients and are not the product of any such conflict.

## **Item 18 – Financial Information**

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Neither Cassia, nor its management has any adverse financial situations that would reasonably impair the ability of Cassia to meet all obligations to its Clients. Neither Cassia, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Cassia is not required to deliver a balance sheet along with this Disclosure Brochure as the firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance.





## **Form ADV Part 2B – Brochure Supplement**

**for**

**James R. Helvey III  
Managing Partner and Chief Investment Officer**

**Effective: January 28, 2021**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of James R. Helvey III (CRD# 5156968) in addition to the information contained in the Cassia Capital Partners LLC (“Cassia” or the “Advisor” - CRD #159911) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the Cassia Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (336) 723-4585 or by email at [info@cassiacapitalpartners.com](mailto:info@cassiacapitalpartners.com).

Additional information about Mr. Helvey is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5156968.

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## Item 2 – Educational Background and Business Experience

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James R. Helvey III, born in 1958, is dedicated to advising Clients of Cassia as a Managing Partner and Chief Investment Officer. Mr. Helvey earned a Masters in International Affairs from Columbia University in 1984. Mr. Helvey earned a Fulbright Scholarship from University of Cologne, Germany in 1982. Mr. Helvey earned his Bachelor of Arts from Wake Forest University in 1981. Additional information regarding Mr. Helvey's employment history is included below.

### Employment History:

Managing Partner and Chief Investment Officer, Cassia Capital Partners LLC	11/2011 to Present
Partner, CMT Asset Management	12/2005 to 12/2011
President, Helvey and Associates	06/2002 to 12/2005
CEO, Cygnifi Derivatives Services	04/2000 to 06/2002
Managing Director, J.P. Morgan & Co.	07/1985 to 04/2000

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Helvey.*** Mr. Helvey has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Helvey.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Helvey.*** However, we do encourage you to independently view the background of Mr. Helvey on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching his individual CRD# 5156968.

## Item 4 – Other Business Activities

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### Board of Directors – James Helvey - Unpaid

Mr. Helvey serves on the Board of Directors for Wake Forest University Health Sciences Investment Committee and Verger Capital Management. Verger Capital Management is wholly owned by Wake Forest University. Such activity is not uncommon in the financial services industry and such relationships are disclosed to investors. For his role with these companies, Mr. Helvey is required to prepare for and attend regular Director's meetings.

### Board of Directors – James Helvey - Paid

Mr. Helvey serves as a member of the Board of Directors of the Coca-Cola Bottling Co. Consolidated, the Computer Task Group, Inc. and Piedmont Federal Savings Bank where he is compensated for these services. For his role with these companies, Mr. Helvey is required to prepare for and attend regular Director's meetings.

## Item 5 – Additional Compensation

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Mr. Helvey receives Director's fees for his role with the Piedmont Federal Savings Bank Board, Computer Task Group, Inc. and Coca-Cola, Co. Consolidated. Mr. Helvey does not receive any additional forms of compensation for outside board of director activities.

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## **Item 6 – Supervision**

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Mr. Helvey serves as a Managing Partner of Cassia, under the supervision of Charles Barham, Managing Partner and Chief Compliance Officer. Mr. Barham can be reached at (336) 723-4585.

Cassia has implemented a Code of Ethics, an internal compliance document that guides each employee in meeting their fiduciary obligations to Clients of Cassia. Further, Cassia is subject to regulatory oversight by various agencies. These agencies require registration by Cassia and its employees. As a registered entity, Cassia is subject to examinations by regulators, which may be announced or unannounced. Cassia is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Charles D. Barham III, CFP<sup>®</sup>**  
**Managing Partner and Chief Compliance Officer**

**Effective: January 28, 2021**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Charles D. Barham III (CRD# 4157445) in addition to the information contained in the Cassia Capital Partners LLC ("Cassia" or the "Advisor" CRD #159911) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or Cassia's Disclosure Brochure, please contact the Advisor at (336) 723-4585 or by email at [info@cassiacapitalpartners.com](mailto:info@cassiacapitalpartners.com).

Additional information about Charles Barham is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4157445.

## Item 2 – Educational Background and Business Experience

Charles D. Barham III, CFP®, born in 1969, is dedicated to advising Clients of Cassia as a Managing Partner and Chief Compliance Officer. Mr. Barham earned his Bachelors of Arts degree from Wake Forest University in 1992. Additional information regarding Mr. Barham's employment history is included below.

### Employment History:

Managing Partner and Chief Compliance Officer, Cassia Capital Partners LLC	07/2013 to Present
River Oaks Community Church	05/2012 to 09/2013
Senior Vice President, Regional Private Banking Manager, Wells Fargo Bank, N.A.	09/2009 to 10/2011
Senior Vice President, Commercial Banking, Wachovia Bank, N.A.	06/1992 to 09/2009

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP®

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Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Barham.*** Mr. Barham has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Barham.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Barham.*** However, we do encourage you to independently view the background of Mr. Barham on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching his individual CRD# 4157445.

### **Item 4 – Other Business Activities**

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Mr. Barham is dedicated to the investment advisory activities of Cassia's Clients. There are no additional business activities to disclose.

### **Item 5 – Additional Compensation**

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Mr. Barham is dedicated to the investment advisory activities of Cassia's Clients. Mr. Barham does not receive any additional forms of compensation relating to Clients.

### **Item 6 – Supervision**

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Mr. Barham serves as a Managing Partner and Chief Compliance Officer of Cassia. Mr. Barham can be reached at (336) 723-4585.

Cassia has implemented a Code of Ethics, an internal compliance document that guides each employee in meeting their fiduciary obligations to Clients of Cassia. Further, Cassia is subject to regulatory oversight by various agencies. These agencies require registration by Cassia and its employees. As a registered entity, Cassia is subject to examinations by regulators, which may be announced or unannounced. Cassia is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Andrew R. Miller  
Financial Advisor**

**Effective: January 28, 2021**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Andrew R. Miller (CRD# 7151860) in addition to the information contained in the Cassia Capital Partners LLC ("Cassia" or the "Advisor", CRD# 159911) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Cassia Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (336) 723-4585 or by email at [info@cassiacapitalpartners.com](mailto:info@cassiacapitalpartners.com).

Additional information about Mr. Miller is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7151860.

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## Item 2 – Educational Background and Business Experience

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Andrew R. Miller, born in 1995, is dedicated to advising Clients of Cassia as a Financial Advisor. Mr. Miller attended Cedarville University in 2018. Additional information regarding Mr. Miller's employment history is included below.

### Employment History:

Financial Advisor, Cassia Capital Partners LLC	06/2019 to Present
Human Resources Intern, Flow Companies	06/2018 to 06/2019
Accounting Intern, Shelly Company	05/2016 to 08/2016
Intern, Crossroads Group	05/2015 to 08/2015

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Miller.*** Mr. Miller has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Miller.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Miller.***

However, we do encourage you to independently view the background of Mr. Miller on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7151860.

## Item 4 – Other Business Activities

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Mr. Miller is dedicated to the investment advisory activities of Cassia's Clients. Mr. Miller does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Miller is dedicated to the investment advisory activities of Cassia's Clients. Mr. Miller does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Miller serves as a Financial Advisor of Cassia under the supervision of Charles Barham, Managing Partner and Chief Compliance Officer. Mr. Barham can be reached at (336) 723-4585.

Cassia has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Cassia. Further, Cassia is subject to regulatory oversight by various agencies. These agencies require registration by Cassia and its Supervised Persons. As a registered entity, Cassia is subject to examinations by regulators, which may be announced or unannounced. Cassia is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

Effective: January 28, 2021

### Our Commitment to You

Cassia Capital Partners LLC (herein "Cassia" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Cassia (also referred to as "we", "our" and "us") 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.

Cassia does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable 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 Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and 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 Information do we collect from other sources?

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 do we protect your information?

To safeguard your personal information from unauthorized access we use and maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Cassia 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 Cassia 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>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Cassia 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.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this 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.

### Any Questions?

You may obtain a copy of our current privacy policy by contacting the Advisor at (336) 723-4585 or via email at [info@cassiacapitalpartners.com](mailto:info@cassiacapitalpartners.com).

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