

Clearview Wealth Management, LLC

ADV PART 2A: BROCHURE

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May 24, 2021

This brochure provides information about the qualifications and business practices of CLEARVIEW WEALTH MANAGEMENT, LLC. If you have any questions about the contents of this brochure, please contact CLEARVIEW WEALTH MANAGEMENT, LLC at: (949) 333-6394, or admin@clearviewfg.com.

Additional information about our CLEARVIEW WEALTH MANAGEMENT, LLC is available on the Internet at: www.adviserinfo.sec.gov.

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 of an Investment Adviser does not imply any level of skill or training.

Our firm's CRD number is: 288978

Item 2 Material Changes

As a California registered investment adviser, our firm is required to comply with the new reporting and filing requirements. Our Firm Brochure dated **May 24, 2021**, is our new disclosure document prepared according to those requirements and rules.

After our initial filing of this Brochure, this section will be used to provide our clients with a summary of new and/or updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year.

Material Changes (since last update on July 10, 2020):

Clearview Wealth is in the process of registration with the Securities and Exchange Commission ("SEC")

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Item 4 Advisory Business

Clearview Wealth Management, LLC ("Clearview Wealth Management", or "the firm") is an SEC-registered investment adviser with its principal place of business located in Irvine, California.

Clearview Wealth Management is a limited liability company that began to conduct advisory business in 2018. This is an outgrowth of the Investment Management and Financial Planning business established by Mark Phillips in 2003. Mark initially affiliated, as a Registered Rep. and Investment Advisor Representative, with American Express Financial Advisors (later re-named Ameriprise Financial). In 2010, Mark changed affiliation to Commonwealth Financial Network as a Registered Rep. and Investment Advisor Representative.

In 2018, Mark established Clearview Wealth Management as a Registered Investment Advisor and a limited liability company in the state of California in and of itself while maintaining affiliation with Commonwealth Financial Network. The current ownership percentages for Clearview wealth management, LLC is: Mark Phillips 66%, Nick Bautista 17%, and Eric Figarsky 17%.

In May 2019, Clearview Wealth Management and all associated persons of Clearview wealth management terminated the broker-dealer relationship and affiliation with Commonwealth Financial Network. Simultaneous with that, Clearview Wealth management and its affiliated persons established a broker-dealer relationship with TD Ameritrade to have TD Ameritrade provide services to Clearview wealth management on behalf of the client's of Clearview wealth management.

Clearview Wealth Management will offer financial planning, portfolio oversight, investment management, retirement plan consulting services, and broad financial advice services to select individuals and entities. This will be by written contract with these individuals and entities. The scope of advice and oversight will be in alignment with the training and expertise of the professionals engaged by and affiliated with the firm. In addition, these services will be limited to the work as explicitly detailed in the written contract between Clearview Wealth Management and these select individuals and entities. The services provided will be tailored to the individual needs of each client. As such, each client may impose limited restrictions on the scope of advice for financial planning or retirement plan consulting services and the specific securities or investment vehicles considered for inclusion within their financial plan and/or investment management strategy.

Clearview Wealth Management offers the following advisory services to our clients:

Wealth Management Consulting/Financial Planning:

Clearview Wealth Management provides financial planning advisory services on a wide range of financial topics, including, but not limited to, budgeting and cash flow analysis, major purchases, education planning and funding strategies, retirement income/longevity planning strategies, portfolio and investment analysis, estate planning analysis and strategies, business succession planning strategies, and fringe benefit analysis. Individuals may engage

Clearview Wealth Management for consulting services on a negotiated hourly, or fixed-fee basis.

Recommendations and advice offered by Clearview Wealth Management do not constitute legal, tax, or accounting advice. Individuals and entities engaging Clearview Wealth Management for financial advice and oversight should coordinate and discuss the impact of the financial strategies discussed in the areas involving law and tax that they receive from a Clearview Wealth Management advisor with their attorney and/or accountant.

Clearview Wealth Management may, within the scope of comprehensive financial planning, offer many clients investment portfolio allocation advice within the scope of agreed to services for these clients. This advice may include how a client's invested assets may be optimally proportioned between broad asset classes (stocks, bonds, cash) or between asset categories (US Large Co. stock, International Co. stock, Treasury Bonds, High Yield Bonds, Real Estate Investment Trusts, etc.). In providing any such advice we consider a wide variety of investments and securities and do not offer advice on limited types of investment or security only.

The effectiveness of the financial planning services provided by Clearview Wealth Management advisors depend largely on the personal information the client provides to the advisor. For Clearview Wealth Management advisors to provide appropriate financial planning advice to you as our client it is very important that you provide accurate and complete responses to your advisor's questions about your financial condition, needs and objectives, and any reasonable restrictions you wish to apply to the choices you prefer to make regarding all areas of your financial life. It is also important that you inform your Clearview Wealth Management advisor of any changes in your financial condition, personal circumstances, and your needs and wants (goals), if any, that you suspect may in any way affect the overall financial planning, insurance, Tax, and investment strategies that may optimize your likelihood of success.

Investment Management Services

Clearview Wealth Management enables advisors of the firm to assist clients in developing a personalized investment portfolio using one or more investment types, including, but not limited to, stocks, bonds, mutual funds, exchange-traded funds ("ETFs"), UITs, variable and fixed-indexed annuities, and alternative investments. The advisor typically acts as portfolio manager, with full investment discretion, although clients may elect to have the advisor manage the account on a nondiscretionary basis. The client agrees to pay for this service typically by having the advisor directly charge the agreed to fee to the account being managed.

The advisors of Clearview Wealth Management are Investment Advisor Representatives. As such they may offer investment management services to you as a client of Clearview Wealth Management.

If you engage your advisor to also, and separately, work for you as your investment advisor, and you establish a relationship with, and open investment accounts through him/her as or assign him/her to be your Investment Advisor on an existing account, you will pay an investment management and oversight fee to Clearview Wealth Management per our

fee schedule and agreement. Your advisor and other advisors of Clearview Wealth Management will receive a portion of the fee that Clearview Wealth Management charges to you for this investment management service.

Clearview Wealth Management, LLC receives no compensation for services outside of the compensation received directly from clients like you for advisory services provided to clients engaged with Clearview Wealth Management in a financial planning, investment management, and or retirement plan consulting arrangement.

As of May 7, 2021, there is \$106,840,000 in discretionary assets under management.

Retirement Plan Consulting Services

The advisors of Clearview Wealth Management provide fee-for-service Retirement Plan Consulting Services (RPC) whereby advisors offer one-time or ongoing advisory services to qualified retirement plan sponsors (RPC clients). Clients may engage advisors for Retirement Plan Consulting services on a negotiated hourly, flat, fixed, and/or asset-based fee basis. The maximum annual account consulting fee, when stated as a percentage of assets, is not to exceed 1.50% of plan assets unless that amount is less than \$3000 which is the minimum retirement plan consulting annual fee. Advisors may assist plan sponsors with their fiduciary duties and provide both broad education and individualized advice to plan participants based upon the needs of the plan and/or plan participants regarding investment management matters, such as:

- Plan Design and features
- TPA review and benchmarking
- Fee and other plan cost benchmarking
- Guidance on QDIA and enrollment safe harbor
- Trustee record-keeping
- Participant communication
- Investment policy statement support
- Investment selection and monitoring
- Overall portfolio composition
- Participant advice programs

this service is separate from financial planning or ongoing investment management services offered by the firm. If individual participants of a retirement plan for which Clearview wealth management's provides retirement plan consulting services wish to engage the advisors of Clearview Wealth Management for individual financial planning and or investment management services that participant will need to sign a separate and distinct agreement as an individual for those services and pay for them separately.

Item 5 Fees and Compensation

Financial Planning Fees

For our financial planning services that we provide to clients separately from or inclusive of investment management, we receive a fixed fee paid either annually quarterly or monthly from the client. This fee is negotiated in advance with the client based in part on the time

commitment and scope of work agreed to. Our fees typically range from \$600 per year (\$50 monthly) to \$10,000 per year (\$833 monthly) however, under special circumstances they may be greater or lesser than these amounts.

Under special circumstances we may charge an hourly fee or a fixed limited term fee for work that is not expected to be continuous and ongoing with a client.

- Hourly Basis (not to exceed \$500/hour)
- Fixed Fee on a limited term/engagement or project basis (for work not expected to exceed 12 months)

Investment Management Fees

For our investment advisory services, we typically charge a fee as a percentage of assets under management. This fee varies with the type of account, the scope of work, and the amount of assets in the account and in the client household that we manage. This fee rate is negotiated with the client and agreed to in advance. As such fee schedule with each client may be unique and varied from the next. Even within a client household different accounts, requiring different levels of advisory and oversight involvement may be charged at different fee rates. We may also, by agreement with the client, direct that investment advisory service fees for the household be charged to specific accounts rather than against the assets in all account's pro rata. However, we will never charge a client more than 2.25% of the total of assets under management for that client's household. The incremental maximum Investment management fee on a householding basis is as follows:

Incremental Assets in household	Maximum Marginal Fee Rate (Annual)	Maximum Quarterly Fee Rate
First \$100,000	2.25%	.5625%
Next \$150,000	2.00%	.50%
Next \$750,000	1.85%	.4625%
Next \$1,000,000	1.70%	.425%
Over \$2 million	1.50%	.375%

In addition to the annual investment advisor management fee, and unless otherwise agreed between the client and the advisor, clients engaging Clearview Wealth Management as an investment advisor will pay transaction charges as described in the "Other Fees and/or Costs" section of their custodial agreement with their custodian (TD Ameritrade institutional, Schwab institutional, Fidelity institutional, etc.). These charges are collected directly by the third-party service providers and none of these fees is paid directly through to Clearview Wealth Management or any of its representatives.

Retirement Plan Consulting Services Fees

Clients may engage advisors for Retirement Plan Consulting services on a negotiated hourly, flat, fixed, and/or asset-based fee basis. Fixed annualized fees range from \$3000-\$60,000 per year, however under special circumstances they may be greater or lesser than these amounts. A variable fee as a percentage of plan assets may range from 0% to 1.5%. In either circumstance the fee is negotiated in advance with the client based in part on the

time commitment and scope of work agreed to. The maximum annual account consulting fee, when stated as a percentage of assets, is not to exceed 1.5% of plan assets unless that amount is less than \$3000 which is the minimum retirement plan consulting annual fee.

By agreement with the client we typically deduct the fixed and or variable advisory fees from the clients account(s) quarterly or monthly, however we may, alternatively, bill the client for these fees on an annualized, quarterly or monthly basis. Fees may be paid at the time of service, or in advance of service, by prearranged deduction from subject account, check, electronic fund transfer or credit card.

Except as otherwise agreed to at the time our services are contracted all fees for financial planning services, investment management services, and retirement plan advisory services shall be charged and payable in advance. They may be paid in advance on a monthly quarterly or annual basis as agreed to with the advisor. If the advisory agreement is terminated before the end of a period for which fees have been collected in advance then the advisor will calculate the pro rata amount of fees collected that have been earned based on a time basis and the amount of unearned fees will be refunded to the client within 90 days.

Fees are subject to negotiation and will vary depending on the specific circumstances and services agreed to. The project and monthly fee engagements will generally include the development and delivery of a written report or plan at least one time. This may be done in digital (PDF) format and transmitted electronically to you or made available to you via a web site portal we will provide to you.

In the case of a monthly and ongoing arrangement, we will regularly (at least annually) review and update the analysis/plan with you. This may be done in digital (PDF) format and transmitted electronically to you or made available to you via a web site portal we will provide to you.

Clearview Wealth Management's services and fees may include investment management, however, will not include or cover any custodian fees or fees charged by record keepers, custodians, fund managers or other third parties including those that Clearview wealth management and its advisors may recommend to you. Further Clearview Wealth Management receives no direct or indirect compensation from any outside investment manager or product provider with whom you may engage. Clients who engage any other investment management advisor or financial or legal advisor are thus advised to review that independent advisors fee schedule and /or ADV 2A Brochure for the professionals' fee schedules, other fees charged and applicable billing methods.

Additionally, investments you purchase as a result of a portfolio and investment analysis within a financial plan may be subject to deferred sales charges, 12b-1 fees, and other fund-related expenses. No investment related fees charged by investment companies (mutual funds, ETF's, fee-based annuities, etc.) and custodians are covered by the fees you pay to Clearview Wealth Management. The fund's prospectus or service agreement should fully describe the fees and expenses you may pay to these third parties as a result of making any such investments through those firms.

All fees paid to Clearview Wealth Management for advisory services are separate and distinct from any fees and expenses charged by mutual funds, ETFs, Closed End Funds, annuities, limited partnerships, REITS, brokerage accounts and account trustees for the purpose of implementing any investment strategy and for any trading you do or engage a third party to do on your behalf. Clearview Wealth Management does not receive any portion of any fee paid out to or collected by investment companies, Broker Dealers, Insurance Companies or other product companies. Clearview does not participate in any wrap fee programs or revenue sharing of any kind with any other firm.

Fees for ***Wealth Management Consulting (you as an individual), and Not-For-Profit Trustee Consulting (you as an entity trustee)*** are to be paid in advance, either on an annual, quarterly or monthly basis.

Either party (Clearview, or the individual/Trustee) may terminate the engagement with 30 days advanced notice in writing. All advisory fees paid for financial planning, analysis and oversight beyond the date of termination will be fully refunded. This refund will be accompanied with an accounting of the amount earned and thus retained by Clearview Wealth Management from the total paid by you as the client.

Note: Clients are not obligated in any manner to implement any of the recommendations offered by their Clearview Wealth Management advisor. They may choose to implement the recommendations of other parties, or to implement the recommendations of the advisor through other parties without the assistance of the advisor.

In many circumstances where you as our client may choose to use an advisor, representative, or agent to implement various strategies offered and recommended to you by your Clearview Wealth Management advisor those other parties will receive, and you may thus pay the representative or agent or the firm for whom they work for implementing the recommendation(s). Paying another advisor, representative or agent (through fees or commissions) for implementation of financial strategies provided you by Clearview Wealth Management will in no way entitle you to any refund or discount of the advisory charges you agreed to pay to Clearview Wealth Management.

Additionally, you may choose to engage your Clearview Wealth Management advisor to assist you as your broker to implement insurance strategies as recommended to you through the financial planning process. For acting as your agent your advisor may receive a commission directly from the insurance company. This is separate from and not related to their work for you through Clearview Wealth Management except that the advisor's duty to provide fiduciary advice and service with regards to any recommendation or implementation of an insurance strategy can and will in no way be diminished even though these services are not offered through Clearview Wealth Management but rather by the agent directly. Choosing to engage your advisor as your insurance agent, for implementation of insurance strategies provided you by Clearview Wealth Management will in no way entitle you to any refund or discount of the advisory charges you agreed to pay to Clearview Wealth Management. Additionally, choosing not to implement the advice offered to you by Clearview Wealth Management will in no way entitle you to any refund or discount of fees paid to or due to Clearview Wealth Management.

Clearview Wealth Management will, upon request, disclose to you the nature and amount of any compensation that they have or may receive as a result of you engaging them to implement any part of the recommendations you received through the financial planning process. Regardless of whether you request this disclosure Clearview Wealth Management are bound by their explicit fiduciary duty to diligently affirm that the product being recommended will be in your best interest.

For California Residents:

CCR § 260.238 of the California Code of Regulations requires that all investment advisers disclose to their advisory clients that lower fees for comparable services may be available from other sources.

CCR § 260.235.2: Our firm is required to disclose if a conflict exists between the interests of the investment adviser and the interests of the client. As such, our client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

CCR § 260.238(k): any material conflict of interest relating to you or your representatives and employees that could be reasonably expected to impair the rendering of unbiased or objective advice should be disclosed. Conflicts of interest may include, but are not limited to, (a) compensation arrangements connected with advisory services which are in addition to the advisory fees, (b) other financial industry activities or affiliations, or (c) participation of interest in client transactions.

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

Clearview Wealth Management does not charge any performance-based fees (or any other fees based on a share of capital appreciation or gains above a set benchmark)

Item 7 Types of Clients

Clearview Wealth Management provide advisory services to the following types of clients: Individuals (including high net worth individuals), Trusts, Estates, Charitable Organizations, Pension/Profit Sharing Plan Sponsors/Fiduciaries, and Corporations/Other Businesses.

There are no minimum accounts sizes engage in financial planning services, Investment Management services, or Retirement Consulting Services. There is however a minimum charge for each of these services.

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

Clearview Wealth Management primarily serve individual clients and trustees. Each advisor associated with Clearview Wealth Management has the independence to take the approach he or she believes is most appropriate when analyzing investment strategies for clients.

As such we formulate our investment advice on a client by client specific basis. As such, overall financial planning strategies, risk management strategies (insurance strategies), estate planning strategies, and investment strategy that we offer to a specific client is very

specific to the circumstances of that client. We use analytic technology as well as investment principles that include, however are not exclusive to, the following: Monte Carlo portfolio analysis, modern portfolio theory, drift triggered rebalancing, fundamental valuation under weighting or overweighting by asset class or asset category. Part of our analysis is designed to determine the capacity for withstanding volatility risk that the client has with specific funds designed for specific purposes. As such, we may invest in funds intended to be used in the near future and or at a rapid rate, more conservatively than an otherwise very similar account whose intention is to be used much further into the future and or at a much slower rate each year. As such our intention is to manage the timing risk associated with investing and distributions from each account. We are also intent on understanding the client's risk tolerance and assisting them in adapting a level of tolerance most beneficial to them to fund the goals that they seek to fund. Additionally, in the choice of asset class and category allocation we use modern portfolio theory combined with other analytic approaches to optimize what we believe will be the ratio of a long-term investment gain relative to the shorter-term investment volatility that a client's investments may encounter.

There are several sources of information that Clearview Wealth Management may use as part of the investment analysis process.

These sources include, but are not limited to:

- Financial publications
- Research materials prepared by others
- Corporate rating services
- SEC filings (annual reports, prospectus, 10-K, etc.)
- Company press releases

As a firm, Clearview Wealth Management does not favor any specific method of analysis to the exclusion of another and, therefore, would not be considered to have one approach deemed to be a "significant strategy." There are, however, a few common strategies that may be used by Clearview Wealth Management, in the course of providing advice to you as a client. Please note that there is no investment strategy that will guarantee a profit or prevent loss. Following are some common strategies employed by advisors in the management of client accounts:

- **Dollar Cost Averaging ("DCA"):** The technique of buying a fixed dollar amount of a particular investment on a regular schedule over time, regardless of the share price at the time of purchase. More shares are purchased when prices are low, and fewer shares are bought when prices are high. DCA is believed to lessen the risk of investing a large amount in a single investment at higher price. DCA strategies do not prevent against loss in declining markets.
- **Asset Allocation:** An investment strategy that aims to balance risk and reward by allocating assets among a variety of asset classes. At a high level, there are three main asset classes—equities (stocks), fixed income (bonds), and cash/cash equivalents—each of which has different risk and reward profiles/behaviors. Asset classes are often further divided into domestic and foreign investments, and equities are often divided into small, intermediate, and large capitalization. The general

theory behind asset allocation is that each asset class will perform differently from the others in different market conditions. By diversifying a portfolio of investments among a wide range of asset classes, advisors seek to reduce the overall volatility and risk of a portfolio through avoiding overexposure to any one asset class during various market cycles. Asset allocation does not guarantee a profit or protect against loss.

- **Technical Analysis (aka "Charting"):** A method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value. Instead, they use charts and other tools to identify patterns that can suggest future activity. When looking at individual equities, a person using technical analysis generally believes that performance of the stock, rather than performance of the company itself, has more to do with the company's future stock price. It is important to understand that past performance does not guarantee future results.
- **Fundamental Analysis:** A method of evaluating a security that entails attempting to measure its intrinsic value by examining related economic, financial, and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (e.g., the overall economy and industry conditions) and company-specific factors (e.g., financial condition and management). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis.
- **Quantitative Analysis:** An analysis technique that seeks to understand behavior by using complex mathematical and statistical modeling, measurement, and research. By assigning a numerical value to variables, quantitative analysts try to replicate reality mathematically. Some believe that it can also be used to predict real-world events, such as changes in a share price.
- **Qualitative Analysis:** Securities analysis that uses subjective judgment based on non-quantifiable information, such as management expertise, industry cycles, strength of research and development, and labor relations. This type of analysis technique is different from quantitative analysis, which focuses on numbers. The two techniques, however, are often used together.

Material Risks

Allocation and Planning Tools

The modeling tools used to create financial plans and investment portfolio asset allocation recommendations for clients rely on various assumptions, such as estimates of inflation, risk, economic conditions, and rates of return on security asset classes and categories. All return assumptions use asset class returns, not returns of actual investments, and do not include fees or expenses that clients would pay if they invested in specific products.

Modeling software is only a tool used to help guide us when developing an appropriate plan, and we cannot guarantee that clients will achieve the results shown in the plan. Results will vary based on, among other things, the information provided by the client regarding the client's assets, risk tolerance, and personal information. Changes to the program's underlying assumptions or differences in actual personal, economic, or market outcomes may result in materially different results for the client. Clients should carefully consider the assumptions and limitations of the software as disclosed on the analysis reports and should discuss the results of the plan with us as your advisor, or other qualified advisor(s), before making any changes in their investment or allocation program.

Investments:

The following covers what we believe to be the general and specific risks of investing in and owning of securities we may recommend to individual and entity/trustee clients under our Wealth Management and Retirement Plan and Entity/Trustee Consulting engagements.

General Risks of Owning Securities

All Clearview Wealth Management clients should understand that investing in securities involves risk of loss, and thus all investors must be prepared to bear that risk. Prior to implementing any investment recommendations offered by Clearview Wealth Management, you, the client, should carefully consider all the following:

- You should commit to management only those assets that you believe will not be needed for current purposes and that can be invested on a long-term basis, usually a minimum of three years.
- That volatility from investing in the stock market can occur, and
- That over time your (the entity/Trust's) assets may fluctuate and at any time be worth more or less than the amount invested.

Your investments are not bank deposits and are not insured or guaranteed by the FDIC or any other governmental agency, entity, or person, unless otherwise noted and explicitly disclosed as such, and as such may lose value.

Independent Manager Strategies and Risks

Independent Managers utilize their own investment process and methods of analysis. The strategies and securities these managers invest in may have different or additional risks than those described in this brochure. For example, while Clearview Wealth Management does not implement investment advice using margin transactions, some Independent Third-Party Investment Managers may utilize margin transactions in the discretionary management of client cash and securities. Use of margin can increase volatility and magnify any investment losses in a client's account. Similarly, options may be utilized in various strategies. Options are complex financial instruments and not suitable for all investors. Investing in options carries unique risks that can result in the loss of all invested principal.

Specific Risks for all Investment Products

Clients can find more information about the strategies and related risks of an Independent Managers in Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss in each manager’s Form ADV disclosure brochure, or in the fund managers Prospectus.

Mutual Funds (Open-end Investment Company)

A mutual fund is a company that pools money from many investors and invests the money in stocks, bonds, short-term money-market instruments, other securities or assets, or some combination of these investments. The portfolio of the fund consists of the combined holdings it owns. Each share represents an investor’s proportionate ownership of the fund’s holdings and the income those holdings generate. The price that investors pay for mutual fund shares is the fund’s per share net asset value (NAV) plus any shareholder fees that the fund imposes at the time of purchase (such as sales loads).

The benefits of investing through mutual funds include professional management, diversification, affordability, and liquidity. Mutual funds also have features that some investors might view as disadvantages:

Costs Despite Negative Returns

Mutual funds pay operating and other expenses from fund assets regardless of how the fund performs, which are indirectly charged to all holders of the mutual fund shares. Depending on the timing of their investment, investors may also have to pay taxes on any capital gains distribution they receive. This includes instances where the fund went on to perform poorly after purchasing shares.

Lack of Control

Investors typically cannot ascertain the exact make-up of a fund’s portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.

Price Uncertainty

With an individual stock, investors can obtain real-time (or close to real-time) pricing information with relative ease by checking financial websites or by calling a broker or investment adviser. Investors can also monitor how a stock’s price changes from hour to hour—or even second to second. By contrast, with a mutual fund, the price at which an investor purchases or redeems shares will typically depend on the fund’s NAV, which the fund might not calculate until many hours after the investor placed the order. In general, mutual funds must calculate their NAV at least once every business day, typically after the major U.S. exchanges close.

Exchange-Traded Funds (ETFs)

An ETF is a type of Investment Company (usually, an open-end fund or unit investment trust) containing a basket of stocks. Typically, the objective of an ETF is to achieve returns like a market index, including sector indexes. An ETF is like an index fund in that it will primarily invest in securities of companies that are included in a selected market. Unlike traditional mutual funds, which can only be redeemed at the end of a trading day, ETFs trade throughout the day on an exchange. Like stock mutual funds, the prices of the underlying securities and the overall market may affect ETF prices. Similarly, factors affecting a industry segment may affect ETF prices that track that sector.

Real Estate Investment Trusts (REIT)

Securities issued by real estate investment trusts (REITs) primarily invest in real estate or real estate related loans. Equity REITs own real estate properties, while mortgage REITs hold construction, development and/or long-term mortgage loans. Changes in the value of the underlying property of the trusts, the creditworthiness of the issuer, property taxes, interest rates, tax laws, and regulatory requirements, such as those relating to the environment all can affect the values and liquidity of REITs. Both types of REITs are dependent upon management skill, the cash flows generated by their holdings, the real estate market in general, and the possibility of failing to qualify for any applicable pass-through tax treatment or failing to maintain any applicable exempted status afforded under relevant laws.

Private Funds

A private fund is an investment vehicle that pools capital from several investors and invests in securities and other instruments. In almost all cases, a private fund is a private investment vehicle that is typically not registered under federal or state securities laws. So that private funds do not have to register under these laws, issuers make the funds available only to certain sophisticated or accredited investors and cannot be offered or sold to the general public. Private funds are generally smaller than mutual funds because they are often limited to a small number of investors and have a more limited number of eligible investors. Many but not all private funds use leverage as part of their investment. Private funds management fees typically include a base management fee along with a performance component. In many cases, the fund's managers may become "partners" with their clients by making personal investments of their own assets in the fund. Most private funds offer their securities by providing an offering memorandum or private placement memorandum, known as "PPM" for short. The PPM covers important information for investors and investors should review this document carefully and should consider conducting additional due diligence before investing in the private fund. The primary risks of private funds include the following:

1. Private funds do not sell publicly and are therefore illiquid. An investor may not be able to exit a private fund or sell its interests in the fund before the fund closes.

2. Private funds are subject to various other risks, including risks associated with the types of securities in which the private fund invests

Item 9 Disciplinary Information

We are required to disclose if there are legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or the integrity of your management. Clearview Wealth Management have no disciplinary information to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Clearview Wealth Management does not have a related person who is a: broker-dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

Outside Independent Managers

Clearview Wealth Management offers and may invest client money in third-party money (investment) management services as part of a broad portfolio allocation strategy offered to investment management clients.

Note: We do not foresee any additional conflicts of interest from any outside relationships to disclose.

Associated persons of Clearview Wealth Management are licensed with various insurance companies. Insurance commissions represent a small and shrinking part of the income earned by associated persons of Clearview Wealth Management and we do not concentrate resources in this area. However, associated persons may earn commissions directly from the insurance carriers if you purchase insurance products through them in their separate role as an insurance agent. This may potentially create a conflict of interest. You are under no obligation to purchase insurance products or services through them. To help reduce this risk of conflict Clearview wealth management encourages all associated persons to refer clients needing specific insurance coverage to third-party brokerage firm specializing in that insurance and to establish no financial relationship or compensation arrangement with those third-party firms for any insurance the client of Clearview Wealth Management secures. Clearview Wealth Management also strives to mitigate the conflicts of interest by notifying you of these conflicts. We inform you that you are free to consult other financial professionals and that you may implement recommendations through these professionals. We are bound by our Code of Ethics to act in an ethical manner.

Clearview Wealth Management and its Advisory Representative are not actively engaged in any other financial industry entity other than what is disclosed herein and on ADV 2B.

How we handle conflict of interest

Clients should be aware that additional compensation by our firm and its management

persons or access person may create a material conflict of interest. We strive (on all occasions) to put the interest of you, our clients, first as part of our fiduciary duty as an SEC registered investment adviser.

Our firm will take the following steps to address any material conflicts of interest:

- We will disclose to you, as our client(s), the existence of all material conflicts of interest
- We will disclose to you, as our client(s), that you are not obligated to purchase any recommended investment products
- We will endeavor to collect and maintain accurate, complete and relevant client information with regards your financial goals, investment objectives and risk tolerance;
- Our employees must receive approval for any outside business activities;

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

Clearview Wealth Management has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Clearview Wealth Management takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as our policies and procedures. Further, we strive to handle your non-public information in such a way to protect information from falling into the hands of anyone who has no business reason to know such information. We provide you with our Privacy Policy that details our procedures for handling your personal information. Clearview Wealth Management maintains a code of ethics for its Advisory Representatives, supervised persons and office staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, our Code of Ethics establishes our firm's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

Neither Clearview Wealth Management nor its associated persons maintain a material financial interest in any securities.

Clearview Wealth Management and its associated persons may invest in the same securities (or related securities, e.g., warrants, options or futures) that we as advisors to you, our client, recommends to you to purchase or purchases for you in a managed account on your behalf. We will not trade positions of affiliated persons of the firm ahead of our clients ("front running"), and as such, will act in the best interests of our clients whenever executing trades in your account. We do not foresee any conflicts from these activities and we only make recommendations that are aligned with the client's risk tolerance, objectives, and financial profile.

All related persons to this registered investment advisor, inclusive of household members of related persons, will be treated for investment purposes as if they are clients of the firm. As this relates to collective funds ('40 act funds, ETF's, closed-end funds and the like) this creates no conflict of interest as there is no affective opportunity to benefit from front running or any other trading scheme that would otherwise disadvantage clients. As this might relate to individual stock or bond securities trades made on behalf of all related persons to the practice shall be made in a manner so as not to disadvantage clients in any way.

If ever a related person to this investment advisory practice were to buy individual securities (individual stocks or bonds) on or around the same time that the same securities are purchased or sold for clients on their behalf every effort will be made to trade the clients securities so that the client receives as good or better execution/price then is received by the related person to the investment advisory practice. In the case of selling securities this will typically mean that the client securities are sold in advance of the related person securities or are sold at the same price. In the case of the purchase of securities this would typically however not always, mean that the securities are purchased on behalf of the client's account in advance of purchasing them for the related person's account, or to ensure that they are purchased at the same price for both.

Item 12 Brokerage Practices

Clearview Wealth Management participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

- TD Ameritrade and Clearview Wealth Management are separate and unaffiliated.
- TD Ameritrade offers services to independently registered investment advisers such as Clearview Wealth Management which include custody of securities, trade execution, and clearance and settlement of transactions. The Firm receives some benefits from TD Ameritrade through its participation in the TD Ameritrade Institutional program.
- Clearview Wealth Management may recommend TD Ameritrade to clients for custody and brokerage services.
- The Firm receives economic benefits through its participation in the TD Ameritrade Institutional program which may include however are not limited to the following: Morningstar Advisor Workstation (nonproprietary securities research and analytics tool), I rebalance (and portfolio management, rebalancing, and trade execution tool), money guide Pro (a financial planning software tool), Doc-U-Sign (electronic

document completion and signature tool), Black Diamond (portfolio management, client reporting portal) and other support services and tools which the firm intends to use the benefit of any client of the firm appropriate.

- The Firm, through its participation in the program, may receive discounts on compliance, marketing, technology, and practice management products or services provided to the Firm by third party vendors.
- These benefits received by the Firm, or its associated persons, do not depend on the amount of brokerage transactions directed to TD Ameritrade.
- the Firm's receipt of general platform services does not diminish the Firm's duty to act in the best interests of its clients, including seeking best execution of trades for client accounts.

We recommend however do not require that clients of the firm wishing to establish an investment advisory account with us as their registered investment advisor open account(s) with TD Ameritrade institutional. We are open to having the clients, should they strongly prefer to do so, to open an account with Schwab institutional or fidelity institutional. We do not believe that in recommending TD Ameritrade institutional we will be unable to achieve most favorable execution of client transactions or that this practice may have any negative cost consequences to clients. We believe that the choice of TD Ameritrade institutional is in the best interest of the clients both are a cost basis, and execution basis, and based the registered investment advisor's ability to perform and provide best in class services to the client.

Clients of the practice may choose to direct their brokerage business to and through alternative broker-dealer/custodians to those that we as a registered investment advisor recommend. That may result in less favorable and less active oversight on our part as registered investment advisors, limitations on our ability to manage those specific accounts, higher costs to the clients, and other unfavorable features of which we are not currently aware. In these cases, the firm and its advisors will work to the best of our ability on behalf of the client however will not be in a position to mitigate or correct for the loss of oversight and management capability nor to compensate for what may be higher costs that the client incurs. Client must understand that this is their choice and their responsibility

When it is practical from an execution and a cost standpoint the registered investment advisor will make every effort to aggregate the purchase or sale of securities for various client accounts to reduce cost and achieve best execution on the trade. There may be many circumstances when the same securities are being purchased or sold for different client accounts where we do not aggregate the purchase or the sale. We will make this determination as to when it is best to aggregate purchase or sale of securities based on what is best for all the clients involved and what is possible with the technology and capabilities that we have access to as registered investment advisor

Soft Dollars: Clearview Wealth Management receives minimal direct or indirect financial support from insurance, investment or other product companies. In the past 12 months we have received less than \$3000 of financial support from investment product companies. The largest of these was less than \$1300 from anyone from anyone investment products company. All that support has been used mitigate the cost of client and prospect education events. We expect this level of support to be maintained. No support that we receive prompt service as an advisory firm to be more apt to recommend investment products of one firm over another. There is no expectation on the part of an investment products company that providing a support will guarantee them any level of future investments from our firm in their products.

Clearview Wealth Management and its advisor representatives do not receive client referrals from any broker-dealer or outside portfolio managers or other investment product companies when recommending or using brokers, portfolio managers or other investment products for client accounts.

Item 13 Review of Accounts

Clearview Wealth Management will review your client accounts and/or financial plans as a part of its services. If your engagement with Clearview Wealth Management is on an ongoing basis an Advisor Representative of Clearview Wealth Management will update and review with you your financial analysis and plan at least annually.

This is predicated on you providing current and up to date goals, financial circumstance and other related information as needed by the advisor in advance of your meeting(s). The Advisor, or other staff and advisors of Clearview Wealth Management will be available to you to address questions and issues that you encounter between meetings via phone and email. Additionally, a copy of analysis and advice will be shared with you via a combination of email (PDF documents) and/or web portal document sharing.

If you are an hourly advice client of Clearview Wealth Management, we will provide you analysis and advice as we have agreed to do so and only upon your explicit request. The scope of the analysis and advice will be limited and specific to that/those areas and questions in our written agreement with you. No oversight or monitoring will be provided by Clearview Wealth Management outside of the specific topics agreed to and for the time for which you have paid us to be engaged with you. We will provide a written report to you of our analysis and recommendations. A copy of analysis and advice will be shared with you via a combination of email (PDF documents) and/or web portal document sharing.

If you are a project, or limited term, advice client of Clearview Wealth Management we will provide you analysis and advice as we have agreed to do so and only upon your explicit request. The scope of the analysis and advice will be limited and specific to that/those areas and questions in our written agreement with you. No oversight or monitoring will be provided by Clearview Wealth Management outside of the specific topics agreed to and for the time or scope for which you have paid us to be engaged with you. We will provide a written report to you of our analysis and recommendations. A copy of analysis and advice will be shared with you via a combination of email (PDF documents) and/or web portal document sharing.

For the purposes of Investment Management Services that we provide we intend to review client investment accounts that are under active management every business day that the market is open and actively traded. This review includes however may not be limited to and oversight of investment allocation by asset class and category as compared to the specific allocation intended for each given account. Will also review all accounts subject to investment management oversight for appropriateness of specific securities held therein. At least annually we will review with the client the investment strategy selection for each specific account and for the household in general.

At any time during a period of engagement You must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require your Advisory Representative to review your plan and make amendments.

A copy of analysis and advice will be shared with you via a combination of email (PDF documents) and web portal document sharing. Other than the initial report, or annual analysis and plan, there will be no other formal report or analysis issued to you.

Item 14 Client Referrals and Other Compensation

Clearview Wealth Management receives no monetary and non-monetary assistance with client events, provide educational tools and resources from product vendors (annuity, insurance, investment funds, etc.). We do not recommend any products or product specific strategies as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. Clearview Wealth Management's due diligence of a planning strategy, including an investment strategy, is thus not influenced by any assistance from any product vendor.

As disclosed under Item 12, above, Clearview Wealth Management participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Clearview Wealth Management's participation in the program and the investment advice it gives to its Clients, although the firm receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by the firm's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit the firm but

may not benefit its Client accounts. These products or services may assist the firm and its associated persons in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, the firm and its associated advisors always endeavors to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the firm and its associated advisors in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Clearview Wealth Management attempts to mitigate any conflicts of interests by notifying you of the conflicts and informing you that you are free to consult other financial professionals. We are bound by our Code of Ethics and fiduciary duty to act in an ethical manner and place your interests first and foremost.

Clearview Wealth Management does not directly or indirectly compensate any person or entity that is not a supervised person of our firm for client referrals.

Item 15 Custody

Clearview Wealth Management does not have constructive custody of client accounts, funds, or securities. Custody is maintained through a third-party custodian (typically TD Ameritrade institutional, alternatively Schwab institutional, or fidelity institutional). Clients will receive account statements quarterly or more frequently from the custodian and clients should carefully review those statements.

Advisor will directly debit client account(s) as per mutual agreement for the investment advisory management fees.

Item 16 Investment Discretion

For all managed investment accounts Clearview Wealth Management requires discretionary authority to manage the selection, purchase, and sale of securities therein on behalf of the clients. We may accept limited restrictions to this discretionary authority in the case where a limited number of securities, or a limited amount of cash held in the sweep account there in may be held and exempted from discretionary management.

If an account is not to be managed investment advisory account, then we will not require discretion and we may discount investment advisory fees on this specific account.

Item 17 Voting Client Securities

Clearview Wealth Management does not have constructive custody of client accounts, funds, or securities. As such Clearview does not vote proxies for its client accounts.

Item 18 Financial Information

Clearview Wealth Management will not require you to prepay more than \$500 for 6 or more months in advance of receiving the advisory service; therefore, a balance sheet is not required to be attached.

Clearview Wealth Management does not have discretionary authority over client accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.

Neither Clearview Wealth Management nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

PPP & EIDL Loans

On May 11, 2020, Clearview Wealth received a Paycheck Protection Plan Loan of \$76,900 and an Economic Injury Disaster Loan of \$150,000 through the SBA in conjunction with the relief afforded from the CARES Act.

Clearview applied for these funds out of an abundance of caution and will use the proceeds of the loan to continue payroll for the firm. During this period, the practice did not suffer any harm nor any interruption of service to our clients.