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**Brochure dated March 31, 2022**

**This brochure provides information about the qualifications and business practices of Conway Jarvis LLC. If you have any questions about the contents of this brochure, please contact us at the telephone number or email address above. 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.**

**Additional information about Conway Jarvis LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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## **Advisory Business**

Conway Jarvis LLC is an independent investment advisor. It provides investment supervisory services to: high-net worth individuals and their families; businesses; trusts; pension and profit sharing plans. The firm was founded in 1994 and is wholly-owned by Greg Conway and Eric Jarvis.

As of December 31, 2021 the firm managed \$443,000,000 in client assets. Those assets are held by brokerage firms in the name of the client. The firm is authorized by clients to use its discretion to invest in the publicly traded securities markets. Advisory services are tailored to the individual needs of each client. Clients may impose restrictions on investing in certain securities or types of securities.

## **Fees and Compensation**

The firm is compensated by fees that are calculated on the amount of assets under active management. A fee schedule is provided to prospective clients prior to engagement of the firm's services. Clients are billed quarterly, in advance, and can choose to pay fees or have them deducted from their account. Unearned fees will be refunded to the client on a pro rata basis. Clients may incur brokerage fees, custody fees, or additional transaction costs as described in the Brokerage Practices section of this brochure.

	<i><b>Assets Under Management</b></i>	<i><b>Fee</b></i>
First	\$1,000,000	1.00% maximum
Next	\$2,000,000	.70% maximum
Next	\$2,000,000	.60% maximum
Above	\$5,000,000	Negotiated Rate

## **Types of Clients**

Conway Jarvis LLC provides investment supervisory services to: high-net worth individuals and their families; businesses; trusts; pension and profit sharing plans. The firm suggests that a prospective client have minimum of \$250,000 of investable assets available for management. Family assets can be aggregated to meet that minimum requirement. This requirement is waived for family members, related persons, or related entities of existing clients.

## **Methods of Analysis, Investment Strategies, Risk of Loss**

The firm employs a combination of macro-economic, fundamental, and technical analysis to select securities. The information used in this analysis is obtained from, research materials, data services, financial publications, filings of public information, and inspection of corporate activities. Analysis and formulation of investment strategies is conducted by the Investment Committee.

The firm uses a broad, multi-level investment strategy to address the needs of a diverse client base. Portfolios are linked to models that employ an all-country, all-capitalization, all-industry approach to investing. Portfolios are invested with publicly-traded securities that reflect both long-term expectations and potential tactical responses to changing conditions in the short and intermediate term. Exchange traded funds may be used where individual stocks lack sufficient liquidity or representation of a specific region or market.

Investing in securities involves risk of loss. Owning equities traded in the public markets presents a material risk of loss from economic instability, market volatility, dissemination of false information, poor performance by a company, and systemic risk arising from fraudulent conduct by market participants. There is risk that the firm could fail to discern the presence of any of these factors when investing client assets.

### **Disciplinary Information**

There are no legal or disciplinary events in the firm's history or that of its owners.

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

Stefan Cobb, CFA is owner of Focus Capital LLC, a Washington State-registered advisory firm. He is a research analyst and member of the Conway Jarvis Investment Committee and in that capacity participates in meetings with clients and prospective clients.

### **Code of Ethics and Personal Trading**

Conway Jarvis LLC acts as fiduciary and adheres to a Code of Ethics that puts the interests of its clients first. It proscribes the conduct of the owners and employees as it relates to clients. Specific provisions deal with limitations on personal trading and maintaining client confidentiality. A copy will be provided to clients and prospective clients upon request.

The owners and employees of the firm are encouraged to buy and sell the same securities as clients. Limitations on personal trading require that the firm's personnel receive no better price of execution on a day when a security is bought or sold for client accounts. Trades in the same security can be made by Conway Jarvis personnel if preceded or followed by a three-day waiting period. The firm maintains a record of all personal trades for the purpose of monitoring personal trading and avoiding a conflict of interest.

### **Brokerage Practices**

Where clients decline to specify a brokerage firm, Conway Jarvis LLC will recommend several from which to choose. Those presented to the client must provide superior order execution, service capabilities, and discounted commission rates after consideration of factors such as reliability, responsiveness, and financial strength. Clients may not pay the lowest possible commission rates where they receive special services such as check-writing privileges, accounting and performance evaluation services. Whenever possible, the firm aggregates the trades of participating clients to obtain best execution and pricing for the purchase and sale of equities. Conway Jarvis can direct the purchase and sale of fixed-income securities to brokerage firms of their choice for the purpose of obtaining best execution and pricing for the client.

### **Review of Accounts**

All client accounts are valued daily and reviewed for performance and asset allocation monthly. More frequent reviews are available upon request. Securities in those accounts are monitored daily and reviewed weekly by the Investment Committee or more frequently if price activity or market conditions dictate.

The firm reports quarterly to clients. The statement provides security pricing, account valuation, and performance of the portfolio benchmarked to an array of indices. Performance is calculated in accordance with CFA Institute standards. The statement is accompanied by a Market Commentary formulated by the firm. A newsletter, the Conway Jarvis Investment Outlook is distributed quarterly.

## **Client Referrals and Other Compensation**

***We apologize for this brief departure from the "plain english" format of our brochure. The following language is required by TD Ameritrade as a prerequisite to Conway Jarvis's participation in their AdvisorDirect referral program. The plain english format resumes after two pages.***

Advisor participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. 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.

As disclosed above, Advisor 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 Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor 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 Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor 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, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons 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.

Advisor may receive client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, Advisor may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with Advisor and there is no employee or agency relationship between them. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise Advisor and has no responsibility for Advisor's management of client portfolios or Advisor's other advice or services. Advisor pays TD Ameritrade an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to Advisor ("Solicitation Fee").

Advisor will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by Advisor from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired Advisor on the recommendation of such referred client. Advisor will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

Advisor's participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, Advisor may have an incentive to recommend to clients that the assets under management by Advisor be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, Advisor has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. Advisor's participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

**Custody**

Conway Jarvis does not take or maintain custody of client funds or securities. Clients will receive monthly statements from the brokerage firm that holds their securities and funds. These should be reviewed carefully and compared to the quarterly statements distributed by Conway Jarvis.

**Investment Discretion**

Conway Jarvis accepts discretionary authority to manage securities accounts on behalf of clients. This authority is granted by execution of a Limited Power of Attorney, provided by the brokerage firm, allowing Conway Jarvis to place trades, receive brokerage statements, view account data, request fund disbursements to clients, and deduct a management fee. This authority is strictly limited to those specific activities

**Voting Client Securities**

Conway Jarvis LLC will, upon request, vote proxies received from companies that are beneficially owned by clients. Guidelines have been established and adhered to by the firm in fulfilling their fiduciary duty to clients. These are stated in the Proxy Voting Policy that is available upon request. Proxy proposals will be evaluated and voted upon in a manner that will promote the financial interests of the clients of Conway Jarvis LLC.

**Conway Jarvis LLC  
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**Brochure Supplement  
May 11, 2020**

**This brochure supplement provides information about Greg Conway, Eric Jarvis, and Stefan Cobb that supplements the Conway Jarvis LLC brochure. You should have received a copy of that brochure. Please contact Greg Conway if you did not receive the Conway Jarvis LLC brochure or if you have any questions about the contents of this supplement.**

**Additional information about the principals and supervised persons of Conway Jarvis LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



## **Part 2B - Supplement**

### **Principals and Supervised Persons**

**Gregory J. Conway** - University of Washington (B.A. Political Science and Gonzaga University Law School (J.D.. General Partner, Principal, Chief Compliance Officer - Conway Jarvis LLC, 1994 to present. Managing Partner, Principal - Conway Labanara Capital Management, 1990-1994. Vice-President, Portfolio Manager - Van Deventer & Hoch, 1989-1991. Vice-President, Corporate Services - Oppenheimer & Co. Inc., 1987-1989. Risk Management Strategist, Futures Specialist, Registered Representative - Dean Witter Inc., 1975-1987. Certifications: Series 3, 7, 24, 63, 65

**Eric P. Jarvis** - University of Washington, (B.A. Business, University of Washington Business School, (MBA in Finance. General Partner, Chief Financial Officer, Director of Portfolio Management - Conway Jarvis LLC, 1994 to present. Director of Operations - Conway Labanara Capital Management, 1992-1994. Buyer/Manager - Nordstrom Incorporated, 1985- 1991. Certifications: Series 65.

**Stefan W Cobb** - BA in Accounting and a BA in Swedish Language from the University of Washington in 1987. Provides research services. He holds certification as a Chartered Financial Analyst (CFA). Director/Owner - Focus Capital LLC, 1999-present. Portfolio Manager - Sirach Capital Management, 1994-1999. Before joining Sirach in 1994, Mr. Cobb worked as an equity research analyst, coverage trader, and institutional salesman for Cable, Howse, and Ragen in Seattle and Robertson, Stephenson in San Francisco. Certifications: CFA, Series 7, 63, 65.