Item 1 – Cover Page

Longview Advisors, LLC

Registered Investment Advisor

Newton Office & Mailing Address:
301 N. Main Street, Suite 201
Newton, KS 67114

Wichita Office Address:
3450 N. Rock Rd, Suite 201
Wichita, KS 67226

(620) 931-5285
www.LongviewAdvice.com

Form ADV Part 2A
Firm Brochure
3/27/2021

This brochure provides information about the qualifications and business practices of Longview Advisors, LLC. If you have any questions about the contents of this brochure, please contact Mr. John Miller, Managing Partner, at (620) 931-5285.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about the Longview Advisors, LLC is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD number, which is 165068.

While the firm and its associates may be registered with the State of Kansas, registration in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

Item 2 - Material Changes

Longview Advisors, LLC amended its Form ADV Part 2 on March 27, 2021 to reflect the following:

- Changes to minimum Wealth management Retainer fee, hourly financial planning rate, and minimum hours required for hourly financial planning (Item 5).
- Longview Advisors obtained a PPP Loan in 2020 (Item 18)
- Longview Advisors obtained professional liability insurance (Item 19).

There were no material changes as of the March 28, 2020 annual amendment.

Longview Advisors, LLC amended its Form ADV Part 2 on July 29th, 2019, to:

- Reflect changes to advisory services and their associated fees (Items 4 and 5).
- Add Wichita office location address.

Longview Advisors, LLC amended its Form ADV Part 2 on April 2, 2019, to reflect changes to advisory services and their associated fees (Items 4 and 5).

Longview Advisors, LLC amended its Form ADV Part 2 on March 30, 2018, to reflect changes to advisory services and their associated fees (Items 4 and 5).

Longview Advisors, LLC amended its Form ADV Part 2 on August 1, 2017, to reflect modification of advisory services and their associated fees (Items 4 and 5).

There were no material changes as of the March 14, 2017 annual amendment.

Longview Advisors, LLC amended its January 27, 2016 Form ADV Part 2 firm brochure due to:

- addition of portfolio management services (Item 4)
- update to our Code of Ethics statement (Item 11)
- new recommended custodian of record (Items 12 and 14)

The firm had previously amended its March 23, 2015 Form ADV Part 2 due to the following changes:

- Update to the firm's contact information (Cover Page)
- Change of firm ownership and primary executive/supervisor (Item 4)
- Modification to our advisory services, their associated fees and payment terms (Items 4 and 5)

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's website at www.adviserinfo.sec.gov or may contact our firm at (620) 931-5285 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

Item 3 - Table of Contents

Form ADV - Part 2

Important Information

Throughout this document, Longview Advisors, LLC shall also be referred to as the “firm,” “our,” “we” or “us.” The client or prospective client may also be referred to as “you,” “your,” etc., and refers to a client engagement involving a single person as well as two or more persons. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.).

Our firm maintains a business continuity and contingency succession plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning the current plan is available under separate cover.

Item 4 - Advisory Business

Description of the Firm

Longview Advisors, LLC is a fee-only financial planning firm that specializes in providing financial planning and investment advisory services to clients at all stages of the financial planning life cycle. Our firm holds itself to a fiduciary standard, which means the firm and its associates will act in the utmost good faith, performing in a manner believed to be in the best interest of our clients.

Our firm is a Kansas domiciled limited liability company formed in 2010; we are not a subsidiary of nor do we control another financial services industry entity. In addition to our 2012 registration as an investment advisor within the State of Kansas, our firm and its associates may register or meet certain exemptions to registration in other jurisdictions in which we conduct investment advisory business.

Mr. John M. Miller, CFP® is the firm's Managing Partner, Chief Compliance Officer (supervisor), Managing Member, and sole unit holder (shareholder). Additional information about Mr. Miller and his professional experience may be found toward the end of this brochure.

Description of Advisory Services Offered

Longview Advisors, LLC typically begins working with you by conducting an introductory interview to determine the scope of services for your engagement. During or prior to your first meeting you will be provided with a current Form ADV Part 2 brochure that incorporates our privacy policy, as well as a brochure supplement about the associate assisting you. The firm will also ensure any material conflicts of interest are disclosed that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage Longview Advisors, LLC for its services, we must first enter into a written agreement (our client services agreement); thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide current copies of the following documents early in the process:

- Wills, codicils and trusts,
- Insurance policies,
- Mortgage information,
- Personal and business tax returns,
- Current financial specifics including W-2s or 1099s,
- Information on current retirement plans and benefits provided by your employer,
- Statements reflecting current investments in retirement and non-retirement accounts, and
- Completed risk profile questionnaires or other forms provided by our firm.

It is important that the information and financial statements you provide is accurate. The firm may, but is not obligated to, verify the information you have provided, which will then be used in the financial planning or investment advisory process.

Planning Service Options

Wealth Management Retainer: A Wealth Management Retainer engagement provides comprehensive financial planning and investment management for a fixed annual fee. This is an ongoing relationship where our firm acts as trusted guide in the financial areas of your life.

Your goals and objectives are identified, discussed, and documented. Recommendations provided are uniquely tailored to you and your current situation. Detailed investment advice and specific recommendations are provided as part of this process, and implementation of those recommendations is always with your permission.

During the **Initial Year**, and dependent upon your needs, there are typically 6-10 meetings covering relevant topics. Each topic is typically covered in a separate meeting. If requested, the number of meetings can be reduced by combining several topics into one appointment. Meetings can be held face-to-face, via secure computer links or by telephone. Implementation services are provided as needed. Topics may include:

- Asset allocation strategies
- Budgeting and cash flow
- Education planning
- Employee benefit analysis
- Estate planning
- Goal setting
- Insurance analysis
- Inventory of assets
- Investment strategy & selection
- Portfolio/net worth analysis
- Real estate (primary or investment)
- Recordkeeping
- Retirement planning
- Charitable gift planning
- Tax planning
- Other financial planning services as requested

In **Renewal Years** there are typically 2-4 meetings, depending upon your needs. Topics may cover the full spectrum but will usually be grouped into meetings to cover at least:

- Investment review
- Portfolio rebalancing
- Portfolio/net worth update
- Tax planning
- Goal setting/Cash flow
- Other financial planning services as requested
- Other Initial Year topics are reviewed every several years, or as needed.

Client will note that the term comprehensive financial planning indicates services are broad-based and integrate planning across multiple areas of their financial life. Advisor does not warrant that services are all-inclusive. There will likely be services in which Client will need to consult with outside professionals or vendors for expertise and services beyond the scope and expertise provided by Advisor.

Financial Planning: Our firm offers hourly Financial Planning services which are designed to address your specific questions or provide you with a comprehensive financial plan. The number of hours to complete the plan will be estimated and will depend on the level and scope of services required. Written recommendations prepared by us under this Agreement do not include specific recommendations of individual securities.

Financial Planning topics can include:

- Asset allocation strategies
- Budgeting and cash flow
- Education planning
- Employee benefit analysis
- Estate planning
- Goal setting
- Insurance analysis
- Inventory of assets
- Investment strategy & selection
- Portfolio/net worth analysis
- Real estate (primary or investment)
- Recordkeeping
- Retirement planning
- Charitable gift planning
- Tax planning
- Other financial planning services as requested

Investment Management

You may also engage our firm to implement investment strategies that we have recommended to you. Depending on your risk profile, goals and needs, among other considerations, your portfolio will involve the employment of one of our investment strategies as well as either a broad range or more narrowly focused choice of investment vehicles which are further discussed in Item 8 of this brochure.

We typically prepare investment guidelines reflecting your objectives, time horizon, tolerance for risk, as well as any reasonable account constraints you may have for the portfolio. For example, you have the right to exclude certain securities (e.g., options, stocks, etc.) at your discretion. These guidelines will be designed to be specific enough to provide future guidance while allowing flexibility to work with changing market conditions. Since this effort is the product of information and data you have provided, you may be asked to review it and provide your final approval. We will then develop a customized portfolio for you based on your unique situation, investment goals and tolerance for risk. We manage your portfolio on a nondiscretionary basis (defined in Item 16). We want to note that it will remain your responsibility to promptly notify us if there is any change in your financial situation and/or investment objectives for the purpose of our reviewing, evaluating or revising previous account restrictions or firm investment recommendations.

We may recommend that you engage the services of a third-party institution investment manager to serve as your portfolio manager. Through our relationship with third-party manager Asset Dedication, LLC, we may recommend one of their three investment strategies described in the following paragraphs. Note that we are not compensated by Asset Dedication, LLC for this service.

Critical Path® links clients' investments with their financial plan; creating a balance between volatility and longevity risk. Low-cost exchange traded funds (ETFs), exchange traded notes (ETNs), and customized bond ladders are often part of your portfolio. The Critical Path® program allows our firm to assist you in determining your goals and mapping out an investment strategy to meet those goals, while remaining flexible to make adjustments along the way to accommodate for various issues such as:

- Life Expectancy
- Inflation
- Spending Needs
- Investment Returns
- Market Volatility
- Healthcare Costs

The Critical Path® is an intuitive approach to navigating the noted issues in a way that you can visualize, and allows you to monitor your investments in the context of your financial plan, decide whether to extend your defined income portfolio, as well as develop an early warning system to take action when necessary.

Defined Income Portfolio

The Defined Income Portfolio is designed to cost-effectively protect principal and reduce exposure to rising interest rates while precisely matching fixed income securities to specific cash flow needs or finding advantageous spots along the yield curve. Fixed-maturity securities allow the client to have the flexibility to change their portfolio as their financial plan evolves. This is in contrast to annuities and other income-producing products that have surrender charges and fees that may restrict flexibility.

Rising interest rates are managed by purchasing fixed-maturity securities and holding them until they mature. This provides what is believed to be an advantage in long-term planning over bond funds that must sell their performing bonds when interest rates rise, and rely on chance to keep yields attractive. Only investment grade bonds are used in order to shelter principal and reduce default risk.

Time Targeted Portfolio

Time Targeted Portfolios are built around specific time horizons (1-3 years, 4-6 years, 7-15 years, and 15+ years) to match a client's time-based goal. Portfolios use game theory algorithms to improve a client's probability of reaching a time-based goal. Since selling equities in a down market may reduce an investor's probability of reaching their goals, the time-targeted portfolio is designed to maximize the minimum returns of the equity portfolio during the time horizon when a client may sell equities.

<u>Educational Workshops</u>

Longview Advisors, LLC may conduct periodic financial educational sessions for those desiring general advice on personal finance and investing. Topics may include issues related to financial planning, college funding, estate planning, retirement strategies, or various other economic and investment topics. Our workshops are educational in nature and do not involve the sale of insurance or investment products. Information presented will not be based on any one person's need nor do we provide individualized investment advice to attendees during our general sessions.

<u>Wrap Fee Programs</u>

Our firm does not sponsor or serve as a portfolio manager in a wrap fee investment program.

<u>Client Assets Under Management</u>

We do not have client reportable assets under our management as defined by the SEC's General Instructions for Part 2 of Form ADV as of the date of this brochure's publication.

<u>General Information</u>

The Longview Advisors, LLC does not provide legal or accounting services. With your consent, we may work with these other professional advisors to assist with coordination and implementation of accepted strategies. You should be aware that these other advisors will charge you separately for their services and it will be in addition to our own advisory fees.

Our firm will use its best judgment and good faith effort in rendering its services. Longview Advisors, LLC cannot warrant or guarantee any particular level of account performance or that your account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that a client may have under federal and state securities laws.

Item 5 - Fees and Compensation

Forms of payment are based on the types of services being provided, term of service, etc., and will be stated in your engagement agreement with our firm. Fees may be paid by check or draft from US-based financial institutions and, with your prior authorization, payment may also be made through a qualified, unaffiliated PCI compliant[1] third-party processor or your account custodian. Our firm does not accept cash, money orders or similar forms of payment for its engagements, nor do we receive an asset-based fee for our services.

Method of Compensation and Fee Schedule

Wealth Management Retainer: $6,500 - $25,000.

Fees are calculated annually and based on your total income, marketable assets, and the overall complexity of your financial situation. Generally, a portion of the fee is due in advance, with the balance billed on a monthly, quarterly, or semi-annually basis, as agreed upon at the beginning of engagement.

Financial Planning: Hourly fees for financial planning and investment consultation services provided by John Miller are $250 per hour with a 4-hour minimum requirement. The number of hours to complete the plan will be estimated and will depend on the complexity and scope of services required. Financial planning fees are calculated by multiplying the number of hours (rounded to the nearest quarter hour) by the hourly rate of $250. Hourly fees are due in full at the beginning of the engagement. In Advisor's sole discretion, fees may be paid with one-half due at the beginning of the engagement and the remainder upon completion.

Workshop Engagements

Our workshop engagements are generally pro bono in nature for session attendees. In the event there is a charge for a workshop, it is anticipated to be paid by the engagement sponsor, such as an employer or association. Fees for these events are typically a fixed amount based on the firm's hourly fee in the development and presentation of the workshop as well as any materials used, and would be negotiated with the sponsor in advance of the presentation.

Charged Prepayment of Client Fees

Financial Planning fees are generally paid upfront. At our sole discretion, we may allow planning fees to be paid as follows: one-half due at the beginning of the engagement and the remainder upon completion. In no event will our firm collect more than $500 more than six months in advance from you. Your payments terms and any required deposit will be defined in your agreement with our firm.

Negotiable Fees

Our published fees may be discounted by our firm but they are not negotiable. We strive to offer fees that are fair and reasonable in light of the experience of the firm and the services to be rendered to our clients, however, similar services may be made available from other providers and potentially at a lower fee.

Client Payment of Fees

Our firm's fees may be paid by check or cashier's draft from a US-based financial institution, or a single transaction credit card payment that is processed through a qualified intermediary. The Advisor may send

---

[1] For an explanation of the term "PCI," who the PCI Security Standards Council is, as well as its comprehensive standards to enhance payment card data security, please go to https://www.pcisecuritystandards.org/security_standards/index.php

the Client an invoice for the payment of its advisory fee, or the Advisor will deduct the fee directly from the Client's account through the qualified Custodian holding the Client's funds or securities. The Advisor will deduct the advisory fee only when the Client has given the firm its authorization to do so and will simultaneously send an invoice to Client. Furthermore, the qualified Custodian will deliver an account statement to the Client, at least quarterly, which will show all disbursements from the Client's account, including the advisory fee deducted on a quarterly basis.

We do not accept cash or similar forms of payment for our engagements. Fees are due as described in your engagement agreement. Our firm reserves the right to stop work on any account which is not paid on a timely basis.

Third-Party Money Manager Fees

Any Third-Party Money Manager fees are in addition to fees paid by you to us. We do not share in the fees that you pay third-party advisors. Fees will be clearly defined in the contract that you sign with the Third-Party Money Manager and their ADV Part 2A Brochure.

Additional Client Fees

A credit and miscellaneous adjustments may be applied, as deemed appropriate, at the discretion of our firm.

The Wealth Management Retainer fee is intended to cover the total cost for one year of service. However, financial planning involves the discovery of financial issues and problems of which you or our firm may not be aware at the beginning of the engagement. If it becomes necessary to revise the initial fee quoted, the reason for the revisions will be discussed with you, provided in writing, and approved by you prior to proceeding.

Longview Advisors, LLC's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client/accountholder. You may incur certain charges imposed by custodians, broker/dealers, third-party investment managers, and other third parties, such as: custodial fees, transfer fees and taxes, wire transfer and electronic fund fees, account termination fees, and other fees and taxes on brokerage account and securities transactions. Fees paid by our clients to our firm for our advisory services are separate from any transactional charges a client may pay, as well as any internal fees associated with mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), or other investments of this type.

Additional information about our fees in relationship to our business practices are noted in Items 12 and 14 of this document.

External Compensation for the Sale of Securities to Clients

Our firm is engaged for fee-only services and we attempt to recommend "no load" investments whenever practical. We do not charge or receive a commission or mark-up on your securities transactions, nor will the firm or an associate be paid a commission on your purchase of a securities holding that we recommend.

We do not receive "trailer" or SEC Rule 12b-1 fees from an investment company we may recommend. Fees charged by issuers are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing. Our firm and its associates receive none of these described or similar fees or charges.

You will always have the option to purchase recommended or similar investments through your own selected service provider.

Termination of Services

Either party may terminate the agreement at any time, which will typically be in writing. Should you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute.

If our Form ADV Part 2 brochure was not delivered to you at least 48 hours prior to entering into the investment advisory contract, then you have the right to terminate the engagement without fee or penalty within five business days after entering into the agreement. Should you terminate an engagement after this time period, you may be assessed fees for any time or charges incurred by our firm in the preparation of your plan or investment allocation. We will promptly return any prepaid, unearned amount upon receipt of termination notice.

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

Our fees will not be based upon a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as "performance-based fees." Our fees will also not be based on side-by-side management, which refers to a firm simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not; this type of arrangement, and the conflict of interest it may pose, does not conform to our firm's practices.

Item 7 - Types of Clients

While our current client-base consists of individuals and high net worth individuals, we offer our advisory services to pension, profit sharing, and 401(k) plans; trusts, estates, or charitable organizations. We strive to work with people from all different walks of life. As such, we maintain no minimum income, net worth or asset requirements.

Our work with most clients is done an open-retainer basis, however, the client's relationship with our firm and the corresponding fee will be based upon individual circumstances and needs. We recognize that certain engagements involve a portion of our retainer fee to be based upon client assets under our management; therefore, at no time will our correlating retainer fee exceed two percent of investible assets. We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or pre-existing relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

Method of Analysis

Our firm generally employs a fundamental analysis; evaluating economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. The main sources of information we may rely upon when researching and analyzing securities will include traditional research materials such as financial newspapers and magazines, annual reports, prospectuses, filings with the SEC, as well as research materials prepared by others, company press releases and corporate rating services. Longview Advisors, LLC subscribes to various professional publications deemed to be consistent and supportive of our firm's investment philosophy.

Moreover, our firm approaches investment portfolio analysis and implementation based on internal factors such as your tax situation, overall risk tolerance, current financial situation, and personal goals and aspirations. After identifying these items, your portfolio will be structured around your individual needs, while attempting to minimize negative effects of external factors, such as interest rates, market performance, and the economy as a whole.

Investment Strategies

In general, we recommend no-load mutual funds (i.e., mutual funds that have no sales fees), ETFs, U.S. government securities, money market accounts, certificates of deposit[2] (CDs), and individual bonds (corporate, agency and municipal). However, in the course of providing investment advice, we may address issues related to other types of assets that you may already own. Any other investment vehicles that may be deemed appropriate for you will be discussed, based upon your goals, needs and objectives.

We generally favor passive investment management utilizing asset class diversification through low cost investment vehicles, and we believe a properly diversified portfolio consisting of an appropriate weighting in different asset classes will generally outperform an individual asset class over time.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. While we will use our best judgment in rendering services to you, not every investment decision or recommendation made by us will be profitable. We cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Investment decisions are subject to various market cycles, currency, economic, political and business risks. You assume the risks involved in investing, to include:

Company Risk – When investing in securities, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as unsystematic risk through appropriate diversification.

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

Fundamental Analysis – The risk involved in employing fundamental analysis is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

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

[2] Longview Advisors, LLC may recommend but does not distribute certificates of deposits, money market accounts or similar savings vehicles. Longview Advisors, LLC is not a financial institution, is not a member of the Federal Deposit Insurance Corporation (FDIC), nor is required to be an FDIC member. You may learn more about the FDIC and how it serves financial institution depositors by going to their website at www.fdic.gov. Securities recommended through Longview Advisors, LLC are not FDIC-insured.

Management Risk – An investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.
Market Risk – When the stock market as a whole or an industry as a whole fall, it can cause the prices of individual stocks to fall indiscriminately. This is also called systemic or systematic risk.

Passive Investing – When employing a passive, efficient markets approach, an investor will need to consider the potential risk that the broader allocation may at times generate lower-than-expected returns than that from a specific asset, and that the return on each type of asset is a deviation from the market return for the asset class. It is felt that this variance from the "expected return" is generally low under normal market conditions if the portfolio is made up of diverse, low or non-correlated assets.

Research Data – When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

Security-Specific Material Risks

ETF and Mutual Fund Risk - The risk of owning ETFs and mutual funds reflect the risks of their underlying securities. ETFs and mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees.

Fixed Income Risks - Various forms of fixed income instruments, such as bonds, money market funds, bond funds, and certificates of deposit, may be affected by various forms of risk, including:

- Credit Risk - The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and typically have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.

- Duration Risk - Duration is a measure of a bond's volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

- Interest Rate Risk - The risk that the value of the fixed income holding will decrease because of an increase in interest rates.

- Liquidity Risk - The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

- Reinvestment Risk – With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

Index Investing - ETFs and indexed funds have the potential to be affected by "active risk" or "tracking error risk," which may be defined as a deviation from a stated benchmark. Since the core portfolio attempts to closely replicate the benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a "sample" or "optimized" index fund or ETF that may not as closely align. In these instances, a portfolio manager may choose to reduce the weighting of a satellite holding, utilize very active satellites, or use a "replicate index" position as part of its core holdings to minimize the effects of the tracking error in relation to the overall portfolio.

QDI Ratios - While many ETFs and certain mutual funds are known for their potential tax-efficiency and higher "qualified dividend income" (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF or mutual fund portfolio), may be considered "non-qualified" under certain tax code provisions. We consider a holding's QDI when tax-efficiency is an important aspect of the client's portfolio.

Item 9 - Disciplinary Information

Neither the firm nor any member of its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our firm's advisory business or the integrity of our firm.

Item 10 - Other Financial Industry Activities and Affiliations

Our policies require the firm and any associated person to conduct business activities in a manner that avoids conflicts of interest between the firm and its clients, or that may be contrary to law. We will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise our impartiality or independence.

Our firm and its associates are not registered nor have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm, nor are we required to be registered with such entities. Neither our firm nor its management is or has a material relationship with any of the following types of entities:

- accounting firm or accountant
- another financial planning firm
- bank, credit union or thrift institution, or their separately identifiable departments or divisions
- insurance company or agency
- lawyer or law firm
- pension consultant
- real estate broker or dealer
- sponsor or syndicator of limited partnerships
- trust company

- issuer of a security, to include investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)

Upon request we will provide referral to various professionals, such as an accountant or attorney. While these referrals are based on the best information made available, our firm does not guarantee the quality or adequacy of the work provided by these professionals. There is not an agreement with these entities nor are referral fees received from these professionals for such informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by our firm.

The external portfolio managers that we may recommend to you (see Item 4) are required to be registered as investment advisors. If we recommend that your portfolio be created and maintained by an external manager, we will first ensure that their firm is appropriately registered and/or notice-filed within your state of residence. Note that we are not compensated by the other investment advisor for our referral.

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

Longview Advisors, LLC believes that its business methodologies, ethics rules, and adopted policies are appropriate to eliminate, or at least minimize, potential material conflicts of interest, and to appropriately manage any material conflicts of interest that may remain. Clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. Our firm will disclose to advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Code of Ethics Description

Longview Advisors, LLC has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons of our firm must acknowledge the terms of the Code of Ethics annually or when amended.

CFP® Principles

Firm associates that are CERTIFIED FINANCIAL PLANNER™ Practitioners also adhere to the Certified Financial Planner Board of Standards, Inc.'s Code of Ethics & Professional Responsibility which you may find at www.cfp.net. These principles include:

Principle 1 - Integrity

An advisor will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisors are placed by clients in positions of trust by clients, and the ultimate source of that trust is the advisor's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 - Objectivity

An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 - Competence

Advisors will maintain the necessary knowledge and skill to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisors make a continuing commitment to learning and professional improvement.

Principle 4 - Fairness

Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5 - Confidentiality

Advisors will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 - Professionalism

Advisors will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 - Diligence

Advisors will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

NAPFA Fiduciary Oath

Associates of our firm that are National Association of Personal Financial Advisors (NAPFA) members adhere to the NAPFA Fiduciary Oath that states:

> The advisor shall exercise his/her best efforts to act in good faith and in the best interests of the client.
>
> The advisor shall provide written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of the engagement, of any conflicts of interest, which will or reasonably may compromise the impartiality or independence of the advisor.
>
> The advisor, or any party in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product.

The advisor does not receive a fee or other compensation from another party based on the referral of a client or the client's business.

Following the NAPFA Fiduciary Oath means I shall:

- Always act in good faith and with candor.
- Be proactive in disclosing any conflicts of interest that may impact a client.
- Not accept any referral fees or compensation contingent upon the purchase or sale of a financial product.

Privacy Policy Statement

Longview Advisors, LLC respects the privacy of all clients and prospective clients (collectively termed “customers”), both past and present. It is recognized that we have been entrusted with non-public personal information and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.
The firm collects personal information about customers from the following sources:

- Information customers provide to complete their financial plan;
- Information customers provide in engagement agreements and other documents completed in connection with the opening and maintenance of an account;
- Information customers provide verbally; and
- Information received from service providers, such as custodians, about transactions.

The firm does not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services our customers have requested (including third-parties such as custodians, TAMPs/sub-advisors; and other technology vendors);
- When our customers have specifically authorized us to do so;
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed not to discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information.

The firm will provide its clients with its privacy policy on an annual basis and at any time, in advance, if firm privacy policies are expected to change.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither the firm nor an associate is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a “related person” (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as an underwriter or advisor to an issuer of securities, etc.

An associate is prohibited from borrowing from or lending to a client unless the client is an approved lending institution.

Our firm remains focused on ensuring that its offerings are based upon the needs of its clients, not resultant fees received for such services. We want to note that you are under no obligation to act on a recommendation from our firm and, if you elect to do so, you are under no obligation to complete them through our firm or a service provider whom we may recommend.

Firm/Personnel Purchases of the Same Securities Recommended to Clients and Conflicts of Interest

Longview Advisors, LLC does not trade for its own account (e.g., proprietary trading). Firm related persons may buy or sell securities that are the same as, similar to, or different from, those recommended to clients for their accounts, and this poses a conflict of interest. We mitigate this conflict by ensuring that we have policies and procedures in place to ensure that the firm or a related person will not receive preferential treatment over a client. In an effort to reduce or eliminate certain conflicts of interest involving personal trading (i.e., trading ahead of client recommendation, etc.), firm policy may require that we periodically restrict or prohibit related parties' transactions. Any exceptions must be approved in writing by our Chief Compliance Officer, and personal trading accounts are reviewed on a quarterly or more frequent basis. Please refer to Item 6 of the accompanying Form ADV Part 2B for further details.

Item 12 - Brokerage Practices

Factors Used to Select Broker/Dealers for Client Transactions

Longview Advisors, LLC does not take physical custody of client assets. Your account must be maintained by a qualified custodian (generally a broker/dealer, bank or trust company) that is frequently reviewed for its capabilities to serve in that capacity by their respective industry regulatory authority. Our firm is not a custodian nor is there an affiliate that is a custodian.

When engaged to provide an investment consultation component of our financial planning service, we may recommend the service provider where client assets are currently maintained. Should a client prefer a new service provider, a recommendation made by the firm would be based on client need, overall cost, and ease of use.

Accounts served by a third-party investment manager are to be maintained at one or more custodians that have been selected by the respective third-party investment manager and they will be disclosed in the third-party investment manager's disclosure documents and account opening forms.

We prefer that our portfolio management services clients use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.[3] Our firm is independently owned and operated; we are not legally affiliated with TD Ameritrade Institutional. While we recommend TD Ameritrade Institutional as custodian of record, the client will decide whether to do so and will open their account in their name with the custodian by entering into an agreement directly with them. We do not technically open the account for a client but we will assist the client in doing so. If a client does not wish to place their assets with TD Ameritrade Institutional as the custodian of record, we may be able to serve as investment advisor with another custodian of the client's choice if the other custodian's policies allow us to do so.

---

[3] Our advisory firm is not, nor required to be, a Securities Investor Protection Corporation (SIPC) member. You may learn more about SIPC and how it serves member firms and the investing public by going to their website at http://www.sipc.org.

TD Ameritrade Institutional offers independent investment advisors various services which include custody of client assets, trade execution, clearance and settlement, etc. Our firm may receive certain benefits from TD Ameritrade Institutional through participation in its independent advisor support program (please refer to Item 14 for further details), however, there is no direct link between our firm's participation in their program and the investment advice we may provide to our clients. Our firm periodically conducts an assessment of any recommended service provider (including TD Ameritrade Institutional) which generally involves a review of the range and quality of services, reasonableness of fees, among other items, and in comparison to industry peers. We do not receive referrals from our custodian, nor are client referrals a factor in our selection of our custodian.

Best Execution

"Best execution" means the most favorable terms for a transaction based on all relevant factors, including those listed in the earlier paragraphs and in Item 14. We recognize our obligation in seeking best execution for our clients; however, it is our belief that the determinative factor is not always the lowest possible cost but whether the selected custodian's transactions represent the best "qualitative execution" while taking into consideration the full range of services provided. Our firm will seek services involving competitive rates but it may not necessarily correlate into the lowest possible rate for each transaction. We have determined having our portfolio management clients' accounts trades completed through our recommended custodian is consistent with our obligation to seek best execution of client trades. A review is regularly conducted with regard to recommending a custodian to our clients in light of our duty to seek best execution.

Directed Brokerage

Our internal policy and operational relationship with our custodian requires client accounts custodied with them to have trades executed per their order routing requirements. We do not direct which executing broker should be selected for client account trades; whether that is an affiliate of our preferred custodian or another executing broker of our custodian's choice. As a result, the client may pay higher commissions or other transaction costs, experience greater spreads, or receive less favorable net prices on transactions than might otherwise be the case. In addition, since we routinely recommend a custodian to our advisory clients, and that custodian may choose to use the execution services of its broker affiliate for some or all of our client account transactions, there is an inherent conflict of interest involving our recommendation since our advisory firm receives various products or services described in Item 14 from that custodian. Note that we are not compensated for trade routing/order flow, nor are we paid commissions on such trades. We do not receive interest on an account's cash balance.

Client accounts maintained at our custodian are unable to direct brokerage. As a result, they may pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case if they had the opportunity to direct brokerage.

For accounts maintained at a custodian of the client's choice (e.g., held-away accounts), the client may choose to request that a particular broker is used to execute some or all account transactions. Under these circumstances, the client will be responsible for negotiating, in advance of each trade, the terms and/or arrangements involving their account with that broker, and whether the selected broker is affiliated with their custodian of record or not. We will not be obligated to seek better execution services or prices from these other brokers, and we will be unable to aggregate transactions for execution via our custodian with other orders for accounts managed by our firm. As a result, the client may pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case.

Aggregating Securities Transactions

Our firm is not engaged for ongoing portfolio management nor do we serve an account on a discretionary basis. We are therefore unable to aggregate ("batch") trades on behalf of client accounts. Since transactions may be completed independently at a service provider of your choice, you may potentially pay more for your transaction or experience wider price spreads than those accounts where trades have been aggregated.

Trading Errors

The firm corrects its trade errors through an account maintained by our custodian, and the firm may be responsible for certain trading error losses that occur within a client account. Clients should be aware that trading error gains in accounts maintained at TD Ameritrade Institutional are swept to a designated account and donated to a 501(c)(3) charity of TD Ameritrade Institutional's choice, and TD Ameritrade Institutional will be obligated to disclose in their own literature to account holders whether such recipients' receipt of such donations presents a material conflict of interest.

Client Referrals from Custodians

We do not receive referrals from our preferred custodian, nor are client referrals a factor in our selection of a custodian.

Item 13 - Review of Accounts

Schedule for Periodic Review of Financial Plans/Accounts

The frequency of review depends on your situation and is individually determined by you. Unless provided for in your engagement agreement (e.g., retainer services), reviews are generally conducted under a new or amended agreement and will be assessed at our current fee rate.

Wealth Management Retainer clients are provided with periodic reviews, no less frequently than annually. A review may be triggered by your request, change in your situation, changes to tax laws, change in market conditions, new information about a particular investment, etc. Reviewer is John Miller.

Wealth Management Retainer clients typically receive financial planning recommendations soon after the conclusion of a client meeting. Financial Planning clients receive financial planning recommendations as agreed upon based on the specific project. Recommendations are provided by John Miller.

A copy of revised plans or asset allocation reports will be provided to the client upon request.

Review of Client Accounts on Non-Periodic Basis

You are free to contact our firm for additional reviews when there are material changes that occur in your financial situation (i.e., change in employment status, an inheritance, the birth of a new child, or other circumstances) or should you prefer to change requirements involving your account.

Non-periodic reviews are generally conducted by John Miller, possibly under a new or amended agreement. A copy of revised plans or asset allocation reports will be provided to the client upon request.

Content of Client Provided Reports and Frequency

Whether you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are held. We urge you to carefully review these statements for accuracy and clarity, and to ask questions when something is not clear.

Our firm may provide portfolio “snapshots” when engaged to provide periodic asset allocation or investment advice. We do not provide account-level performance reports through our advisory engagements. Clients are urged to carefully review and compare account statements that they have received from their account custodian with any report they may receive from any source if that report contains any type of performance information. Our firm may rely upon the Client for the accuracy of items that are reported by the client such as Bank Account balances, values of their home or mortgage, and values of accounts for which our firm does not have a Limited Power of Attorney or Inquiry Access to. Clients are frequently provided net worth statements and net worth graphs. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Item 14 - Client Referrals and Other Compensation

As disclosed in Item 12, our firm may receive economic benefit from TD Ameritrade Institutional in the form of various products and services they make available to the firm and other independent investment advisors that may not be made available to a “retail investor.” There is no direct link between our firm’s participation in their program and the investment advice we may provide to our clients. These benefits may include the following products and services (provided either without cost or at a discount):

- receipt of duplicate client statements and confirmations
- research related products and tools
- access to trading desks serving our clients
- access to block trading services
- the ability to have advisory fees deducted directly from a client’s accounts (per written agreement)
- resource information related to capital markets and various investments
- access to an electronic communications networks for client order entry and account information
- access to mutual funds with no transaction fees and/or select investment managers
- discounts on marketing, research, technology, and practice management products or services provided to our firm by third-party providers

Some of the noted products and services made available by TD Ameritrade Institutional may benefit our advisory firm but may not directly benefit a client account, and certain research and other previously referenced services may qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services from TD Ameritrade Institutional benefits our firm because it does not have to produce or purchase them as long as firm clients maintain assets in accounts at TD Ameritrade Institutional.

There is a conflict of interest since our firm has an incentive to select or recommend a custodian based on our firm’s interest in receiving these benefits rather than your interest in receiving favorable trade execution. It is important to mention that the benefit received by our firm through participation in any custodian’s program does not depend on the amount of brokerage transactions directed to that custodian, and our selection of a custodian is primarily supported by the scope, quality, and cost of services provided as a whole -- not just those services that benefit only our advisory firm. Further, we will act in the best interest of our clients regardless of the custodian we may select.

We do not engage in solicitation activities involving unregistered persons. If we receive or offer an introduction to a client, we do not pay or earn referral fee, nor are there established quid pro quo arrangements. Each client retains the option to accept or deny such referral or subsequent services.

A firm associate may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member. The public may also choose to telephone association staff to inquire about an individual within their area, and would receive the same or similar information. A portion of these participant's membership fees may be used so that their name will be listed in some or all of these entities' websites (or other listings). Prospective clients locating our firm or an associate via these methods are not actively marketed by the noted associations. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

Item 15 - Custody

Your assets will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer, mutual fund companies or transfer agent. Your assets are not physically maintained by our advisory firm nor any associate of the firm. In keeping with this policy involving client funds or securities, our firm:

- Restricts the firm or an associate from serving as trustee or having general power of attorney over a client account;
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;
- Will not collect advance fees of $500 or more for services that are to be performed six months or more into the future; and
- Will not authorize an associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts) if such access would allow physical control over account assets.

You will be provided with transaction confirmations and summary account statements sent directly to you from your custodian of record. Typically, statements are provided on at least a quarterly basis or as transactions occur within your account. You are urged to carefully review your account statements that you have received directly from your custodian. Our firm will not create an account statement for you or serve as the sole recipient of your account statements.

As a reminder, should a client ever receive a report from any source that includes investment performance information, they are urged to carefully review and compare their account statements they have received directly from the custodian of record with any performance-related report.

Item 16 - Investment Discretion

We serve client accounts on a nondiscretionary basis. Such account authority requires the client's ongoing prior approval involving the investment and reinvestment of account assets, portfolio rebalancing, or for our firm to give instructions to the custodian maintaining the account (i.e., wire instructions, etc.). The client will be required to execute our firm's client services agreement that describes our limited account authority, as well as the custodian of record's account opening document that includes their limited power of attorney form or clause.

Item 17 - Voting Client Securities

You may periodically receive proxies or other similar solicitations sent directly from your selected custodian or transfer agent. Should we receive a duplicate copy, note that we do not forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions.

Our firm does not vote proxies on your behalf. We will not offer guidance involving any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. However, we will answer limited questions with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or their legal representative. You will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by you shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other legal matters or events pertaining to your holdings. You should consider contacting the issuer or your legal counsel involving specific questions you may have with respect to a particular proxy solicitation or corporate action.

Item 18 - Financial Information

Our advisory firm will not take physical custody of client assets, nor do we have the type of account authority to have such control. Engagements with our firm do not require that we collect fees from a client of $500 or more for our advisory services that we have agreed to perform six months or more into the future. Neither our firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair its ability to meet commitments to clients, nor has the firm and its management been the subject of a bankruptcy petition.

Due to the nature of our firm's advisory services and operational practices, an audited balance sheet is not required nor included in this brochure.

In 2020, Longview Advisors received a Paycheck Protection Program (PPP) loan due to the uncertainty surrounding the COVID-19 pandemic. However, it is the view of Longview Advisors that the circumstances leading us to seek a PPP loan does not materially impact our advisory relationship with clients.

Item 19 - Requirements for State-Registered Advisers

For further information involving firm principal executive and management personnel, their business activities as well as material conflicts of interest, please refer to areas previously disclosed in Items 6 and 9 through 11, as well as the accompanying Form ADV Part 2B brochure supplement that immediately follows this page (e.g., formal education information and avoidance of performance-based fee compensation). Per Item 10 of this brochure, neither the firm nor a member of its management has a material relationship with the issuer of a security.

Professional Liability Coverage

Pursuant to K.A.R. 81-14-10(b)(2), Longview Advisors, LLC hereby discloses that it does maintain professional liability insurance coverage involving its investment advisory services activities.

Form ADV Part 2B – Brochure Supplement

John M. Miller, CFP®

Managing Partner/Chief Compliance Officer

March 27, 2021

This brochure provides information about John Miller which supplements the Longview Advisors, LLC firm brochure that is referenced in the preceding pages. If there are any questions about the content of this supplement, please contact Mr. Miller by telephone at (620) 931-5285. Additional information about John Miller and Longview Advisors, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Item 1 - Cover Page (Contact Information)

Longview Advisors, LLC	(620) 931-5285
301 N. Main Street/Suite 201	www.longviewadvice.com
Newton, KS 67114	

Item 2 - Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

Principal Executive Officers and Management Persons

Managing Partner/Chief Compliance Officer (Supervisor)

John Michael Miller

Year of Birth: 1987 / CRD Number: 6151948

Educational Background and Business Experience

Educational Background

Accredited Wealth Management Advisor (AWMA®), College for Financial Planning
Fellow in Charitable Estate Planning (FCEP), Charitable Estate Planning Institute
CERTIFIED FINANCIAL PLANNER™ Professional, Certified Financial Planner Board of Standards, Inc.[1]
CFP® Professional Education Program, College for Financial Planning
Bachelor of Arts (History & Religion), Bethel College; North Newton, KS
Attended Goshen College; Goshen, IN

Business Experience

Longview Advisors, LLC (2016-Present)
Newton, KS
Owner/Chief Compliance Officer/Investment Advisor Representative/Lead Advisor

Bluestem Financial Advisors, LLC (2013-2015)
Champaign, IL
Associate Advisor/Financial Analyst

Longview Advisors, LLC (2012-2013)
Partridge, KS
Investment Advisor Representative

Nisly Business Consultants, INC. (2013)
Hutchinson, KS
Tax Intern

Miller Farms (2012-2013; 2016-Present)
Partridge, KS
Treasurer

Sichuan Normal University (2008-2009)
Chengdu, China
English Teacher

Item 3 - Disciplinary Information

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to your evaluation of each officer or a supervised person providing investment advice. Mr. Miller has not been the subject of any such event.

Item 4 - Other Business Activities

Investment advisor representatives are required to disclose outside business activities that account for a significant portion of their time or income, or that may present a conflict of interest with their advisory activities.

Mr. Miller is the Treasurer for Miller Farms of Partridge, KS; and activity involving 10% or less time per month, including during market hours. This activity does not involve clients of the firm, nor is it believed the activity creates a conflict of interest involving advisory services.

Mr. Miller is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. He does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service (“trail”) fees from the sale of mutual funds.

Item 5 - Additional Compensation

Mr. Miller is not compensated for advisory services involving performance-based fees. Firm policy prohibits an associated person from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients.

Item 6 - Supervision

Mr. Miller serves in multiple capacities for the Longview Advisors, LLC: Managing Partner and Chief Compliance Officer (supervisor), Managing Member and investment advisor representative. It is recognized there is an inability to segregate certain duties which may potentially create conflicts of interest; however, policies and procedures are employed to ensure appropriate recordkeeping and oversight. Questions relative to the firm, its services or this Form ADV Part 2 may be made to the attention of Mr. Miller at (620) 931-5285.

Additional information about the firm, other advisory firms, or an associated investment advisor representative, including Mr. Miller, is available on the internet at www.adviserinfo.sec.gov. A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD number. The IARD number for the Longview Advisors, LLC is 165068. You may also search Mr. Miller by name or his reference number, which is 6151948. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by contacting the Office of the Kansas Securities Commissioner at (785) 296-3307.

Item 7 - Requirements for State-Registered Advisers

There have been neither awards nor sanctions or other matter where Mr. Miller or our advisory firm has been found liable in an arbitration, self-regulatory or administrative proceeding. Neither Mr. Miller nor our advisory firm has been the subject of a bankruptcy petition.

Important Information about Industry Designations and Examinations

[1] 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.

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