



# **ClearView Financial, LLC**

A Registered Investment Advisor in the  
Commonwealth of Virginia

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**Form ADV Part 2  
Firm Brochure  
January 1, 2021**

This brochure provides information about the qualifications and business practices of ClearView Financial, LLC. If you have any questions about the contents of this brochure, please contact us at 804-869-9541 or via [info@cviewfinancial.com](mailto:info@cviewfinancial.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Registration as a Registered Investment Advisor does not imply a certain level of skill or training.

Additional information about ClearView Financial, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Utilize the "Investment Advisor Search" option to search for the firm by name or by the IARD number (282690).



## **2. Material Changes**

The Material Changes section of this brochure will be updated annually and when material changes occur since the previous release of the ClearView Financial, LLC Firm Brochure. Versions will be identified in the footer of the document.

The following changes have occurred since our 2020 Annual Filing:

- Changed firm's main contact number to 804-869-9541.
- Item 4.2 – Types of Services
  - Increased minimum household Assets Under Management (AUM) from \$350,000 to \$500,000 per household.
- Item 4.5 – Assets Under Management Disclosure
  - Discretionary assets under management (AUM) increased from 41,932,339 on 12/31/2019 to \$50,449,488 as of 12/31/2020.
- Item 5.1 – Fee Description
  - Updated Fee Rate Structure AUM breakpoints to reflect increase in household minimum (see above – Item 4.2)

ClearView Financial, LLC 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. This request can be made by e-mail at [kevin@cviewfinancial.com](mailto:kevin@cviewfinancial.com).



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**Important Information:**

Throughout this document, ClearView Financial, LLC may also be referred to as the “firm”, “ClearView”, “our”, “we”, or “us” and these terms are used for the reader’s ease of use while reviewing the brochure.



## **4. Advisory Business**

### **4.1 Firm Description**

ClearView Financial, LLC is a limited liability company initially formed on July 25, 2013 in the Commonwealth of Virginia. ClearView Financial became a registered investment advisor with the Commonwealth of Virginia in February of 2016. The firm consists of two partners who assume various roles:

- Kevin A Bostic, CMT, AIF – Managing Partner (50% Owner)
- Christopher Ryan Harris, AIF – Partner (50% Owner)

The firm was established to provide financial planning and investment advice in a fiduciary capacity. ClearView Financial, LLC follows a Code of Ethics (provided to client) and holds itself to a fiduciary standard. This means the firm acts, at all times, in the best interest of the clients. Any conflicts of interest are disclosed.

The investment philosophy of ClearView Financial, LLC is predicated on the utilization of select technical and fundamental analysis. Portfolios are purposefully designed to assist in pursuing client goals and objectives. Our portfolios begin with a blueprint, and have a specified output, an operator and a quality control check. The blueprint is the client's Investment Policy Statement which is created through initial client consultation. The output is the criteria for managing the portfolio. The operator is ClearView Financial, LLC. The quality control check is the client review.

ClearView Financial, LLC also specializes in providing investment management and financial planning services for individuals, families, estates and trusts. Clearview Financial, LLC is a fee-based investment manager. Financial Planning services are offered to investment management clients at no additional charge. However, through its financial planning services, the firm may receive further compensation if the financial plan reveals the need for a fixed insurance product. This compensation is not paid by the client, instead is through the issuing insurance company. ClearView Financial, LLC expects total annual compensation from these types of occurrences to be less than five percent (5%) of the firm's annual revenue. ClearView Financial, LLC adopted this approach with the mindset of "who better to provide service and recommendation of the product rather than ClearView, a fiduciary acting in the client's best interest." As these recommendations are not common, ClearView felt there was no need to continue referring the client to an outside party when we could maintain diligence over the entire process.

Potential clients are provided the firm's current ADV Part 2 brochure as well as the firm's Code of Ethics, Business Continuity Plan, Privacy Policy Statement and other pertinent information during or before the first meeting.



## 4.2 Types of Services

**Investment Management** - The firm provides investment/asset management services. The client's Investment Policy Statement (IPS) contains the guidelines within which the firm and client operate. It also states the constraints that are to be placed on the portfolio, including but not limited to risk parameters and return expectations. Risk and return are stated separately and in terms that are measurable. The IPS is based on the client's purpose for the investment assets, the client's psychological ability to accept risk, the client's fiscal needs and the client's investment cycle. Each client is presented with an IPS. Not only do plans vary from each client, they may also vary for the same client from time to time. Only written plans can be changed effectively.

ClearView stresses the importance of establishing realistic and measurable goals. We feel it is our duty to educate clients about potential returns of investments to ensure that the client's investment objectives are realistic.

ClearView utilizes various investment vehicles including but not limited to individual stocks, Exchange Traded Products (ETP), mutual funds, individual bonds, futures, equity options and index options.

In the unlikely event that ClearView Financial, LLC terminates the investment advisory relationship with the client, ClearView will default to liquidating investments in the account(s) prior to removing our Limited Power of Attorney arrangement. Our reasoning is that investing involves risk, more specifically the risk of loss. If the former client has not procured the services of another professional within the 30-day waiting period, we defer to avoiding market risk until the client makes their decision. Markets, as well as particular securities and investments, have rapidly changing conditions and could leave the former client exposed without professional management and this is not prudent in our opinion. Further, the client's financial situation may change which could affect their risk profile. It is also believed that if the client decides to self-direct their investments, they will most likely be liquidating the positions anyhow. With that said, ClearView will communicate with the former client and hold existing positions within non-qualified accounts to avoid a taxable event. If the account transfers with positions, ClearView has no obligation to provide advice on the position(s) nor is liable for the performance after the investment advisory relationship has been terminated.

ClearView has adopted an asset under management minimum for new clients equaling \$500,000 per household. This minimum may be adjusted on a case-by-case basis and currently does not apply to existing households as of December 31, 2020.

**Financial Planning** - ClearView provides financial planning services to existing investment management and offers the service on a stand-alone basis. ClearView utilizes a third-party software to develop and monitor financial plans for clients which consist of analysis in the following areas:



- Cash flow
- Savings (retirement, college, etc.)
- Tax strategies (ClearView does not provide specific tax recommendations, please consult your tax advisor)
- Investment Strategies
- Estate and legacy planning
- Long-term and short-term insurance needs

**Retirement Consulting** - ClearView may provide non-discretionary investment recommendations for employer-sponsored plans. The firm distributes this analysis through a service entitled “401k CEO.” This service includes an annual review, personalized financial plan and four quarter commentaries. Clients may choose to act or not to act on the recommendation(s).

#### **4.3 Tailored Services**

Investment management services are tailored specifically to the client’s IPS.

#### **4.4 Wrap Fee Programs**

ClearView Financial, LLC currently does not participate in any wrap fee program.

#### **4.5 Assets Under Management Disclosure**

Currently the firm provides discretionary asset management services on \$50,449,488 assets as of the market close on December 31, 2020.

## **5. Fees & Compensation**

### **5.1 Fee Description**

**Investment Advisory Services** are provided via a fee calculated as a percentage of the assets under management (AUM) annually. Fees are computed based upon the negotiated fee percentage in the Advisory Agreement and the client’s AUM (per account) with the firm. Each client is provided a Fee Schedule which details the fee rate and the accounts/assets which will be included in the fee computation. The annual fee is billed on a quarterly basis. ClearView Financial, LLC has implemented the following fee rate structure:

<u>Assets Under Management</u>	<u>Advisory Fee Rate</u>
\$500,000 - \$749,999	1.50%
\$750,000 - \$999,999	1.25%
\$1,000,000 - \$1,499,999	1.00%
\$1,500,000 and up	0.85%

ClearView and the client reserves the right to negotiate the advisory fee rate based on a variety of factors including but not limited to; size of the account, extent of financial planning services, expected hours of engagement.



**Financial Planning Services** are typically provided to investment advisory clients at no additional charge. ClearView currently does not have a relationship based solely on financial planning. ClearView reserves the right to offer a stand-alone arrangement in the future, which would be provided on a fixed fee schedule (with a negotiable flat fee range of \$1,000-\$2,000) and ongoing reviews based on an hourly rate.

**Retirement Plan Consulting** is provided through the firms' "401k CEO" program. This non-discretionary service includes quarterly commentary and an annual courtesy review. This service is provided for an annual fee of \$500 to new "401k CEO" clients (after 12/31/19).

### 5.1.1 Fee Schedule & Examples

#### Investment Advisory Services

There are three types of investment advisory fees.

- **Inception Fee**

At the account opening, a fee will be assessed which is calculated from the day the Advisor begins management of the account through the last day of the current quarter based upon the market value of assets at account inception. Inception fees are calculated using the following formula:  
$$\text{Market Value} * \text{Fee Rate} / \# \text{ of Days in Year} * \text{Days remaining in quarter} = \text{Inception Fee}$$

Example:

\$100,000 market value at account opening

1% Fee Rate

365 Days In Year

52 days in quarter

$$\text{Inception Fee} = \$100,000 * .01 / 365 * 52 \text{ (days remaining in quarter)} = \$142.46$$

- **Quarterly Fee**

All subsequent quarterly fees will be based on the account(s) market value on the last day of the previous quarter and billed in advance. Direct debit fees will post within 10 days after the close of the previous quarter. Invoiced fees must be remitted within 30 days of invoice date. Quarter ends are recognized as March 31<sup>st</sup> (3/31), June 30<sup>th</sup> (6/30), September 30<sup>th</sup> (9/30), and December 31<sup>st</sup> (12/31). Quarterly fees are calculated using the following formula:

$$\text{Market Value} * \text{Fee Rate} / 4 \text{ (quarters per year)} = \text{Quarterly fee}$$

Example:

\$100,000 Quarter End Market Value

1% Fee Rate

$$\text{Quarterly Fee} = \$100,000 * 1\% / 4 = \$250.00$$



- **Termination Fee**

If the client relationship is terminated in a quarter, remaining advisory fees will be reimbursed to the client, assuming the entire quarterly fee has been assessed. Termination refunds are applied using the following formula:

Quarterly Fee / # of Days in Quarter \* # of Days Remaining in Quarter

Example:

\$250.00 Quarterly Fee

92 Days in Quarter

50 Days Remaining in Quarter

Termination Refund =  $\$250.00 / 92 * 50 = \$135.87$

No fee adjustment will be made during a fee period for appreciation or depreciation in the Client's asset value during that period, nor shall any adjustment or refund be made with respect to partial withdrawals or additions by the client during any fee period.

The fee only covers the services provided by the firm and does not include fees assessed by the custodian. The client shall be solely responsible for these additional expenses.

## 5.2 Billing Methods

### Investment Advisory Services

When advisory fees are assessed, the client shall receive an invoice showing the calculation of the fee and market values used in the assessment. Payments can be made directly from the managed account or via separate payment.

- **Direct Debit**

By signing the firm's advisory agreement as well as electing the option with the utilized custodian, the client will be authorizing the withdrawal of the advisory fee from the managed account.

- **Separate Payment**

Client will receive an invoice and must remit payment within 30 days of the invoice date.

## 5.3 Other Expenses

Any transactional or service fee(s) assessed by a custodian, will be borne by the client. Clients may also incur expenses assessed through Exchange Traded Funds (ETFs), Mutual Funds, Exchange Traded Notes (ETNs) or other investments of this type. These annual expense ratios will be disclosed to the client. As part of our fiduciary responsibility to clients, the firm identifies annual expense ratios in its analysis when determining which investment products to use.



#### **5.4 Fee Refund**

**Investment Advisory Services** - If the client relationship is terminated in a quarter, the client will receive a fee refund which is described in item 4.1 of the Firm Brochure as well as the client's advisory agreement (Fee Schedule).

In the unlikely event of a billing error, ClearView will reimburse the client for the difference between the assessed fee and the accurate fee if the adjustment is in the client's favor. This rebate will be issued via check and will not include interest. If the fee adjustment is not in the client's favor, no action will be taken by ClearView.

#### **5.5 Other Compensation**

We do not receive SEC Rule 12b-1 fees. We do not charge or receive a commission or mark-up on your securities transactions. No finders fees are accepted.

As mentioned in Item 4 above, ClearView Financial, LLC may recommend a fixed insurance product based on financial planning services provided. Partner, C Ryan Harris, is also insurance licensed. As such, he may be compensated if the client purchases the fixed insurance product. To protect our clients from inherent conflicts of interest involved in these transactions, we provide the client with an Insurance Review Form. This form will detail compensation received, reason for the recommendation, alternative options (if any), as well as other specifics regarding the transaction.

The firm contends that providing the recommendation, rather than referring out, further facilitates our acting in the client's best interest. Once referred out, we are unable to monitor the actions of the third-party. Keeping the recommendation in-house allows us to service the product on a continual basis as we do with other services.

The firm projects the annual compensation from insurance transactions will be less than five percent (5%) of the firm's total annual revenue.

ClearView Financial, LLC also notes the cost of insurance to the client is not affected by compensation received by the firm (i.e. – the cost of insurance is the cost of the plan selected as is not affected by the agent). The client is not paying the firm's compensation.

Partner Kevin A Bostic allowed his insurance licenses to lapse in 2015. As such, he will not be making the specific recommendations. However, to maintain the congruent nature of the 50/50 firm arrangement, Mr. Bostic may receive higher compensation from the investment advisory services segment of the business to offset monies received from insurance products. This may be construed as indirect compensation on insurance products.



## 5.6 Qualified Plan (IRA) Rollover Considerations and Analysis

ClearView Financial, LLC may recommend that you withdraw assets (rollover) from your employer's retirement plan and into an Individual Retirement Account (IRA). ClearView may then manage this IRA on a discretionary basis on your behalf. This practice may present a conflict of interest.

When an employee departs a company, they generally have four options regarding their employer-sponsored retirement plan:

1. Leave the funds in the former employer's plan.
2. Move the funds into the plan of a new employer (if applicable).
3. "Cash out", taking a taxable distribution from the plan.
4. "Rolling" the funds into a rollover IRA.

While each plan may have advantages and disadvantages, ClearView Financial, LLC considers the following points and encourages clients to do the same:

1. Employer sponsored plans generally have less investment options than an IRA.
2. Employer sponsored plans may offer unique investment options not available in IRAs, such as securities of the employer.
3. Employer sponsored plans may have lower fees than those assessed by ClearView Financial, LLC. However, ClearView provides discretionary asset management while employer sponsored plans generally have no advice given to the plan participant.
4. ClearView strategies may have higher risk than options in the employer sponsored plan (and vice versa).
5. Employer sponsored plans may offer more liability protection than rollover IRAs. While IRA assets have generally been protected from creditors in bankruptcies, there may be some exceptions so you should consult an attorney if you have concerns about protecting retirement assets from creditors.
6. You may be able to take a loan from your employer sponsored plan but not from an IRA.

## **6. Performance Based Fees**

Investment Advisory Fees are not based upon a share of capital gains or capital appreciation (growth of account). Currently, ClearView does not use a performance-based fee structure. Performance-based compensation may create an incentive for the advisor to make investments that are riskier or more speculative than would be the case in the absence of a performance fee.

However, we withhold the right to offer this arrangement to future clients if we decide to pursue this avenue. Any change in this regard must be noted in the ADV as a "Material Change" and clients will be notified.



## **7. Types of Clients**

ClearView provides investment advisory services to individuals (including Personal Trusts and IRAs). Client relationships vary in scope and length of service. To provide the best service and advice, we depend on information provided by the client to establish a written Investment Policy Statement.

The firm seeks to provide services to households with AUM of \$350,000 or greater, however certain exceptions can be made based on the client profile. This is discussed with potential clients during the initial consultation.

## **8. Methods of Analysis, Investment Strategies & Risk of Loss**

### **8.1 Methods of Analysis**

The firm bases its investment advisory services on several factors, including but not limited to:

- Technical Analysis
- Fundamental Analysis
- Client's financial situation
- Client's goals and objectives
- Client's fiscal needs
- Client's risk tolerance
- Client's investment time horizon

The main sources of information include charting, financial newspapers and websites, research materials prepared by third parties, annual reports, prospectuses, company press releases, filings with the Securities & Exchange Commission, among others.

### **8.2 Investment Strategies**

ClearView's investment approach typically focuses on strategies designed for capital appreciation. The firm also provides a strategy with the primary objective of providing dividend and interest income. While most strategies are designed to provide a specific objective, no strategy provides a guarantee or protects against a loss, and also includes various types of risks (detailed below in section 8.3). Each strategy may have exposure across the four main asset classes (cash, equities, bonds and hard assets) at the discretion of the firm's Portfolio Manager, Kevin A Bostic, CMT, AIF.

Client's assets are allocated across the portfolios based on the client's goals and objectives as well as their investment time horizon which are described in the Investment Policy Statement. Client's assets may be invested in more than one portfolio.



## 8.3 Risk Awareness & Risk of Loss

### Risk Awareness

Risk can be viewed as the volatility of return over a market cycle or as the actual loss of money. Risk, in the financial services industry, is most commonly measured using historical standard deviation. Standard deviation is a historical measure of the variability of returns. If a portfolio has a high standard deviation, its returns have been volatile. A low standard deviation indicates returns have been less volatile. However, the longer an investor is exposed the probability of the high standard deviation event (left tail risk) occurring increases.

We feel this practice has a tendency to directly conflict with the needs of the client. It is our opinion the typical client views risk as the loss of money. Routinely, in bear market cycles, clients who were deemed to be “risky” learn they are more risk adverse than previously suggested. In times of extreme duress in capital markets, benefits usually sought through asset allocation are null as most asset classes tend to correlate. This is due to investors liquidating all positions, regardless of the asset type. Market risk, due to price shocks, can never be controlled or eliminated. The only way to reduce the probability of a loss due to a price shock is to be out of the market as much as possible.

Our firm attempts to measure risk in absolute terms, not relative terms. We do not ask our clients how much money they can lose in relation to the “market” or a given index.

The most important point we make to our clients is that risk is never removed from a portfolio – it is only moved. For example, even in our daily lives we “move risk”. Buying car insurance for your vehicle does not eliminate the possibility of an accident. You’ve only moved the risk to an insurance company. The same notion can be applied to your investment portfolio. We identify the types of risk we feel the client’s will endure based on their Investment Policy Statement. Risks identified are as follows:

- **Abandonment** - risk that faces investors when they abandon a particular investment strategy at the wrong time due to an emotional reaction towards a recent development. It is emotionally driven and results in buying high and selling low as the investor bounces between strategies.
- **Psychological** - risk associated with a "herd mentality" and can occur at market tops and bottoms. Euphoric emotions and the fear of "missing out" results in investors taking on more risk than they are prepared to accept.
- **Systematic (Market)** - risk that will affect all securities in the same manner. It is caused by an event or factor that can't be controlled by diversification.
- **Unsystematic (Business)** - measure of risk associated with a particular security. It can be mitigated through diversification.
- **Principal (Risk of Loss)** – all investments in securities include a risk of principal loss. Markets fluctuate over time and performance of any investment is not guaranteed. There is a risk of loss, no matter the strategy, that is beyond the control of the investor or portfolio manager/advisor.



- **Opportunity** – risk that a better opportunity may present itself after an investment decision has been made. Also associated with Abandonment and Psychological risks.
- **Interest Rate** - risk involved with a fixed-rate debt instrument or other fixed-rate security when there is a rise in interest rates. Securities that offer a fixed rate of return tend to decline in value in a rising interest rate environment.
- **Credit** - risk associated with a particular bond issuer defaulting on principal repayment or interest rate payment.
- **Liquidity** - risk that an investor may face if they are not able to buy or sell a particular investment because opportunities (volume, supply, demand) are limited.
- **Inflation**- the chance that the value of an asset or stream of income will be eroded over time due to the devaluation of a currency. For example, the loss of purchasing power of the US dollar. From time to time, portfolios managed by ClearView may hold large cash balances for extended periods. If we feel it is in the client's best interest we may adjust portfolio cash allocations to 100% which could result in a risk of loss for being out of the market.
- **Turnover** – portfolios that endure higher than average transactions are at risk of higher execution costs and taxable events. We manage portfolios based on the stated objectives. Many times this may result in routine changes to the holdings within the portfolio. This may result in higher transactions costs that will be borne by the client. Furthermore, if the account is non-qualified there may be additional taxable events that require the client to pay taxes otherwise not incurred in a static portfolio.
- **Deflation**- the opposite of inflation where the value of one's currency increases, thus decreasing the value of assets, goods and services while also increasing the real value of one's debt.
- **Reinvestment** - risk that faces bondholders in a declining interest rate environment as they are unable to invest proceeds from called or maturing bonds at equivalent rates. Therefore, they assume investments that have lower income streams or must take on market or credit risk in order to maintain the same level of income.
- **Currency** - effects that fluctuations of currencies (foreign and domestic) have on the value of a security.
- **Political** - risk associated with an unfavorable government action.
- **Legislative** - risk involved with the change of prevailing law by a government that may affect the price of a security or securities.
- **Exchange Traded Products (ETPs)** - ETPs are subject to risk similar to those of their underlying securities, including, but not limited to, market, investment, sector, or industry risks, and those regarding short-selling and margin account maintenance. Some ETPs may involve international risk, currency risk, commodity risk, leverage risk, credit risk, and interest rate risk. Performance may be affected by risks associated with nondiversification, including investments in specific countries or sectors. Additional risks may also include, but are not limited to, investments in foreign securities, especially emerging markets, real estate investment trusts (REITs), fixed income, small-capitalization securities, and commodities. Each



individual investor should consider these risks carefully before investing in a particular security or strategy. Investment returns will fluctuate and are subject to market volatility, so that an investor's shares, when redeemed or sold, may be worth more or less than their original cost. Unlike mutual funds, shares of ETPs are not individually redeemable directly with the ETP. Shares are bought and sold at market price, which may be higher or lower than the net asset value (NAV).

### **Risk of Loss**

All investment strategies/programs have certain risks that are borne by the investor. Investing in securities (including but not limited to; individual stocks, bonds, Exchange Traded Products, mutual funds, options, limited partnerships, futures contracts) involves risk of loss that clients should be prepared to bear.

## **9. Disciplinary Information**

### **9.1 Disclosure**

The firm and its owners have not been involved in any legal or disciplinary events related to past or present investment clients. The firm is obligated to disclose any disciplinary event that would be material to you when evaluating us as an Investment Advisor.

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

ClearView Financial, LLC, as detailed above in Item 4 and 5, may recommend fixed insurance products. C Ryan Harris, 50% Partner, is also insurance licensed.

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

### **11.1 Firm Code of Ethics**

ClearView has committed to a Code of Ethics. This code recognizes the firm's fiduciary duty to each client. Its intent is to guard against violations of securities laws and to manage potential conflicts of interest. The Principles of Conduct include:

1. Act in a professional and ethical manner at all times
2. Act in the client's best interest.
3. Act with solidarity and objectivity.
4. Uphold the rules governing capital markets, investment advisors and code of conduct.
5. Act with skill, competence and diligence.
6. Communicate with clients in a timely and accurate manner.
7. Adhere to not engaging in unethical practices included in the State Corporate Commission (SCC) 21VAC5-80-200.



A copy of the firm's Code of Ethics is made available to any client or prospective client upon request and at the inception of the client relationship.

### **11.2 Cross Transactions**

The firm does not engage in proprietary trading (does not trade for its own account). We do not engage in cross transactions (buying from or selling securities to clients).

### **11.3 Personal Investing**

The firm and family members of firm associates may engage in the same investment strategies as suggested to clients. Our policy on personal accounts requires that employee accounts are traded in the same block (block trades are transactions in which a security is purchased in one transaction and allocated over several accounts rather than traded in each individual account) and in the same manner as client accounts as to mitigate any conflicts of interest. If personal accounts are not included in block trades, employee accounts will generally be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades. Therefore, client accounts have precedence over those of the firm and its employees. Personal accounts may hold more concentrated positions, take more risk, and be more actively traded than client accounts. This may cause personal accounts to have differing performance from clients based on risk, position size, or increased trading activity in a given security. The firm believes in investing in the same securities and strategies we recommend to clients.

## **12. Brokerage Practices**

### **12.1 Custodial Recommendations**

ClearView does not maintain custody of client assets. Client assets must be maintained with a qualified custodian. Our firm does not have an affiliation with a custodian. However, ClearView recommends the utilization of TD Ameritrade, a securities broker-dealer and a member of FINRA and SIPC. We consider the quality of the brokerage services provided by TD Ameritrade when making this recommendation. You may pay higher commissions and/or trading costs than those that may be available elsewhere. We participate in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc.

TD Ameritrade was acquired by Charles Schwab Corporation on November 25, 2019. As of 12/31/19, the specifics of the acquisition and its effect on TD Ameritrade clients is not fully realized. If and when material changes to the custodial services provided are realized, ClearView will promptly notify clients.

### **12.2 Soft Dollar Benefits**

ClearView does not receive direction compensation from anyone other than clients and possibly insurance companies (will be disclosed). However, we do receive some non-direct compensation as a result of our relationship with the preferred Custodian, TD Ameritrade. This includes confirmation statements, trade confirmations, access to market data (quotes),



research, access to certain mutual funds, performance statements and electronic trading access. All clients benefit from these as it reduces the firm's overall expenses plus our association with this firm allows us to provide a discount to commission charges assessed to clients that utilize the custodian.

The preference of TD Ameritrade as a custodian for clients is not affected by any soft dollar benefits. As part of our fiduciary duties to clients, we put the interests of our clients first. Clients should be aware that the receipt of economic benefits by us could create a potential conflict of interest and may directly influence our choice of TD Ameritrade for custody and brokerage services.

### **12.3 Brokerage for Client Referrals**

The firm does not receive referrals from a broker-dealer or third party for recommendations.

### **12.4 Directed Brokerage**

We request that our firm execute transactions through TD Ameritrade. As such, we may be unable to achieve the most favorable executions and you may bore higher broker commissions than available through other broker-dealers. Clients may instruct us to use one or more brokers for their transactions. In this case, clients should understand that this might prevent us from aggregating trades with other client accounts.

### **12.5 Block Trades**

We routinely combine multiple orders for shares of the same security purchased for Client's accounts we manage. This is commonly referred to as "block trading". When we combine orders, each participating account pays an average price per share for all transactions and pays a proportion share of all transaction costs. Shares will then be distributed to participating accounts in a fair and equitable manner.

## **13. Review of Accounts**

### **13.1 Review Frequency**

For clients that ClearView provides continuous investment management services, we provide a minimum an annual client review. This review may be conducted by either or both of the firm's partners (Kevin A Bostic, CMT, AIF or C Ryan Harris, AIF).

### **13.2 Factors that trigger Account Review**

Conditions that may trigger a review include but are not limited to; change in tax law, new investment information, change in the client's financial situation, change in the client's Investment Policy Statement or a change in the client's fiscal need (raise cash).

### **13.3 Regular Reporting**

ClearView provides investment advisory reports on a quarterly basis. The advisory reports will be delivered to client in one of three ways: 1) if we conduct a face-to-face review the report will be hand delivered or 2) if the client elects a hard copy, we will mail to the



client's address of record. 3) electronically via email or via our online investor portal provided by Black Diamond / Advent Software, Inc. Custodians provide monthly reports which include a listing of assets, their current valuations, listing of all transactions occurred in the review period and a listing of all additions or withdrawals from the account.

## **14. Client Referrals & Other Compensation**

### **14.1 Referrals**

ClearView may accept referrals from various parties including clients, centers of influence, personal friends, attorneys, accountants or other similar sources. We do not compensate the referring parties for their referrals.

### **14.2 Compensation for Referrals**

ClearView does not accept referral fees or any form of compensation from other professionals when a prospect or client is referred to them.

## **15. Custody**

All client assets are held at qualified custodians. All client assets are held in the client's name. ClearView Financial, LLC does not act as a custodian.

## **16. Investment Discretion**

ClearView Financial, LLC accepts discretionary authority to manage assets on behalf of clients. The firm has the authority to determine the securities to be bought or sold and the amount of the securities to be bought or sold.

The firm is limited to the following actions: ability to execute trades, receive account statements and confirmations, and make withdrawals from the account solely for the purpose of deducting the agreed upon investment advisory fee. A limited power of attorney form is supplied by the custodian for this purpose.

The firm also provides investment advice on a non-discretionary basis. Under these terms, clients have no obligation to follow-through on the advice given.

## **17. Voting Client Securities**

### **17.1 Proxies**

ClearView Financial, LLC does not vote proxies for client securities. Assistance on voting proxies may be provided if requested by client. Any conflicts of interest will be disclosed.



## **18. Financial Information**

### **18.1 Disclosure Requirements**

ClearView Financial, LLC does not have any financial impairment that will hinder the firm's ability to meet contractual commitments to clients.

A balance sheet is not required to be provided as the firm does not act as a custodian for client assets and does not require prepayment of fees of more than \$500 per client and six months or more in advance.

## **19. Requirements for State-Registered Advisors**

### **19.1 Partners**

**Christopher Ryan Harris, AIF** is a partner of ClearView Financial, LLC.

Ryan is on the local Board of Directors for Richmond National Association of Insurance and Financial Advisors (NAIFA) and has been a standing Million Dollar Round Table (MDRT) qualifier from 2011-2015. Ryan attained the Uniform Investment Advisor Law Examination (FINRA Series 65), the Investment Company and Variable Contracts Products Representative Examination (FINRA Series 6), the Uniform Securities State Law Examination (FINRA Series 63) as well as applicable state life and health licenses. Ryan also attained the Accredited Investment Fiduciary (AIF®) designation through Fi360.com. He received his Bachelors of Science with an emphasis in Information Technology from Virginia Tech in 2002.

Registered Investment Advisors are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each officer or a supervised person providing investment advice. Christopher Ryan Harris does not have any disciplinary action to report.

**Kevin Aaron Bostic, CMT, AIF** is the Managing Partner of ClearView Financial, LLC.

Kevin was born in Winston-Salem, North Carolina (1977) and moved to Richmond, Virginia in June of 2004. He received his Bachelor of Science (BS) in Business Administration from the University of North Carolina at Greensboro. He holds the CRPC (Chartered Retirement Planning Counselor) designation and is a CMT (Chartered Market Technician) charter holder. He attained the General Securities Representative Exam (FINRA Series 7), the General Securities Sales Supervisor (FINRA Series 9), the General Securities Principal Exam (FINRA Series 24) and the Uniform Combined State Law Exam (FINRA Series 66). Kevin also attained the Accredited Investment Fiduciary (AIF®) designation through Fi360.com. Kevin has 15 years of experience in the financial services industry.

Registered Investment Advisors are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each officer or a supervised person providing investment advice. Kevin A Bostic does not have any disciplinary action to report.



### **19.2 Business Continuity Plan (BCP)**

ClearView has a BCP in place that provides detailed steps to mitigate the disruption of business in case of a natural disaster or other event. This document is made available to clients upon their request.

### **19.3 Privacy Policy**

ClearView holds all client personal information (PII) in the strictest confidence. The firm has a privacy policy in place which is made available to clients upon their request.