

Item 1: Cover Page

ADV Part 2A Brochure



VIA GLOBAL ADVISORS, LLC
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This brochure provides information about the qualifications and business practices of Via Global Advisors, LLC. If you have any questions about the content of this brochure please contact us at 781-266-6288 or email at info@viaglobaladvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. We are a Registered Investment Advisor with the United States Securities and Exchange Commission (SEC). Registration with the SEC or any state securities authority as an Investment Advisor does not imply any level of skill or training.

Additional information about Via Global Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Via Global Advisors, LLC is 171399.

Item 2: Summary of Material Changes

This Firm Brochure provides a summary of Via Global Advisors' services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things.

This Item is used to provide Clients with a summary of material changes as defined by the SEC including additional information we deem to be relevant for our current and prospective Clients. The revision(s) are based on the nature of the information detailed below.

Annual Update

Advisors are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of December 31st. Via Global Advisors will provide Clients with either (1) a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE, or (2) we will provide Clients with our revised Brochure that will include a summary of those changes in this Item.

Material Changes

Any time a material change occurs in our operations, depending on its nature, Via Global Advisors will promptly communicate this change to Clients (and it will be summarized in this Item). "Material changes" requiring prompt notification will include changes of ownership or control; location; disciplinary proceedings; significant changes to our advisory services or advisory affiliates – any information that is critical to a Client's full understanding of who we are, how to find us, and how we do business.

Material Changes

As of March 2020, Via Global Advisors, LLC does not have any following material changes to report.

If you would like to receive a complete copy of our brochure, including the supplement, please contact us at 781-266-6288 or by email at info@viaglobaladvisors.com

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Item 4: Advisory Business

Firm Description and History

Via Global Advisors, LLC (“Via Global”, the “Firm”, or the “Advisor”) is a fee-based, SEC registered investment advisor with its principal place of business in Brookline, Massachusetts. The firm was established in March 2013 as a Massachusetts limited liability company with Kimberly Clouse, who has 100% ownership interest in the firm, as the sole managing member. Ms. Clouse has over twenty-five years of experience in the financial services industry. The firm currently has three investment professionals and several professionals who provide operational support.

Via Global, as a wealth manager, provides a comprehensive range of advisory services to a select group of high net worth individuals and families (“Clients”). Via Global works with its Clients to navigate the increasingly complex world of financial advice, make better-informed decisions and increase the likelihood that they will achieve their long-term goals. Via Global provides counsel that is independent, unbiased, and customized.

Types of Advisory Services Offered

Via Global tailors its advisory services to the needs and circumstances of each Client.

Via Global’s investment services include determination and ongoing confirmation of objectives, risk tolerance and ability to bear risk, asset allocation, portfolio management, investment manager search, selection, and monitoring, and coordination of services from investment managers and custodians, as well as estate planning, tax, insurance, philanthropic and other experts. The Advisor manages advisors and decision-making processes across multiple disciplines and promotes constructive relationships among advisors to maximize their collective value to Clients.

Clients are advised to promptly notify Via Global if there are any changes to their financial situation or investment objectives or if Clients wish to add or modify any reasonable restrictions to their investment portfolios.

Depending on Client needs and preferences, Clients’ investment portfolios may be managed in the following ways (or in combination):

(i) Via Global will provide ongoing evaluation and monitoring of third-party investment managers (“Independent Managers”) selected by the Client in consultation with Via Global,

(ii) the Advisor will manage the investment portfolio directly, or

(iii) Via Global will directly hire and manage one or more unaffiliated third-party advisors (“Sub-advisors”) to manage all or a designated portion of the portfolio.

Depending on a Client’s preferences and needs, Via Global may provide its management services on a *discretionary* basis, where the Advisor has full authority to make investments on behalf of the Client, or a *non-discretionary* basis, where the Advisor must obtain Client approval before making any investment.

The terms and conditions under which the Advisor engages Sub-Advisors are set forth in separate written agreements between the Advisor and the designated Sub-Advisors. The fee schedules are described in Item 5 below.

Via Global’s due diligence reviews of Sub-Advisors and Investment Managers (together, the “Managers”) includes firm background, and ownership and reputation, public disclosures, the Manager’s investment strategies, past performance, risk-adjusted results, fee structure and operations (including trading and information security). The Client receives the Managers’ Form ADV brochures either directly or through the

Advisor.

Clients' investment portfolios may be invested in individual debt and equity securities, mutual funds, ETFs, alternative investments, as well as other securities depending on the specific needs of the Client. Clients may stipulate in writing any reasonable restrictions or guidelines with regard to specific securities or certain types of securities or investments.

Via Global does not do the following:

- Provide legal advice
- Provide tax advice

Via Global strongly urges its Clients to consult with the appropriate legal and tax advisors.

Wrap Fee Programs

Via Global does not participate in wrap fee programs.

Client Assets

As of December 31st 2019 Via Global had a total of \$435,601,074 assets under management with \$229,436,997 in non-discretionary assets under management and \$206,164,077 in discretionary assets.

Item 5: Fees and Compensation

General Policy

Via Global's fees are largely determined by the following factors:

- The amount and nature of assets under advisement;
- Whether assets are managed on a discretionary or non-discretionary basis;
- The complexity and degree of expertise required to serve as the Client's Advisor;
- The number of advisors who comprise the wealth management team;
- The number of persons engaged in the decision-making process and the size of the Client group;
- The annual expected number of meetings, phone calls, etc.;
- Other relevant considerations such as travel time.

Via Global does not accept compensation for the sale of securities or other investment products.

As specified in the Client's Investment Advisory Agreement ("Agreement"), the Client shall pay to the Advisor an annual relationship fee, payable in quarterly installments and/or an assets-under-management fee, calculated by multiplying one-quarter of the annual fee rate by the Client's assets under management as of the last business day of the previous quarter-end (but not less than the minimum quarterly fee). Both fees will be due and payable in advance on the first day of every quarter. If the Agreement begins or ends on a date other than the first day of a calendar quarter, the fees for that quarter shall be prorated accordingly, based on the number of days that the Agreement is in effect. Any unearned portions of any fees shall be refunded to the Client promptly.

Unless otherwise noted in the Agreement, fees are deducted directly from the Client's accounts. Clients authorize the custodian of the account to pay fees to the Advisor upon receipt of instructions from Via Global (accompanied by the basis for computing the fee amount). The deduction of the fee will be reflected in the statements provided by the custodian.

Via Global's minimum fee is \$25,000, on an annual basis. Fees for special projects will be negotiated and billed separately.

Unless agreed to in advance with the Client, the Advisor shall bear its out-of-pocket costs (e.g., travel, lodging, communication, copying, and printing charges) incurred in connection with the provision of services to the Client.

If Via Global utilizes Sub-Advisors to manage all or a portion of the Client's account, Via Global may assume responsibility for paying such Sub-Advisors' fees or the Sub-Advisors may bill the Clients directly. If Via Global is responsible for the paying the fee, such arrangement may create a conflict of interest between the Advisor and the Client, insofar as the Advisor is responsible for paying the Sub-Advisor directly, and may therefore have an incentive to select Sub-Advisors that charge the lowest fees. Sub-Advisors may also reimburse Via Global for expenses (e.g., travel and lodging) incurred in the course of conducting due diligence reviews.

Via Global, in its discretion, may negotiate different fee arrangements with Clients. Via Global's fees are exclusive of fees and expenses associated with Independent Managers. Clients will also incur charges imposed by custodians, brokers, bankers and other third parties, including, but not limited to, commissions and money movement fees. Clients who use Investment Managers will enter into investment advisory agreement directly with them and will be billed the specified investment advisory fee by them.

Some investments, such as mutual funds and ETFs, are subject to fund-level expenses, and may have sales loads and transaction fees as described in the fund's prospectus.

Item 6: Performance-Based Fees and Side-by-Side Management

The fees charged by Via Global are not based on capital appreciation of managed securities. The Advisor does not use a performance-based fee structure.

Item 7: Types of Clients

Via Global's Clients are high net worth individuals, families and related entities such as private foundations, family limited partnerships, trusts, etc.

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

Investment Strategies and Methods of Analysis

Via Global evaluates goals, risk tolerance, time horizon, and other factors by gathering information through an initial and ongoing interview process with each Client. Via Global then designs a plan based on these Client-specific factors, which, in the Advisor's judgment, is appropriate for the Client's needs.

Via Global generally suggests diversification across many dimensions, including asset classes, geographies, market capitalization, and liquidity premiums. As many of Via Global's Clients are taxable investors, tax efficiency is important but not the sole consideration in developing a strategy. The Advisor pays particular attention to investment expenses, transactions fees and brokerage commissions that the Client will incur.

The firm may utilize, among other methods, fundamental analysis. Fundamental analysis involves the fundamental financial condition and competitive position of a company. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

If the Client owns or chooses to purchase individual company stocks or bonds, Via Global incorporates

those exposures into the proposed asset allocation. Depending on the Client's source of wealth, ability to bear risk, and other Client-specific factors, Via Global generally discourages Clients from holding individual equity positions that exceed 5% of the investment portfolio, as concentrated positions may increase risk.

Use of Independent Managers and Sub-Advisors

As stated above, Via Global will select, or recommend, Independent Managers and/or Sub-Advisors ("Managers"). Via Global will continue to conduct ongoing due diligence of Managers, but such selections or recommendations rely, to a great extent, on the Managers ability to successfully implement their investment strategy. While Via Global monitors the Managers' performance, it does not supervise Managers on a day-to-day basis.

General Risk of Loss

The profitability of a Via Global's recommendations may depend to a great extent upon correctly assessing the future course of the securities markets and the price movements of stocks and bonds. There can be no assurance that Via Global will be able to predict those price movements accurately.

Investing in public and private securities involves risk of loss that Clients should be prepared to bear. Any investment has risks such as fluctuations in market value. Via Global attempts to minimize the risks by allocating investments across cash, stocks and bonds and certain alternative investments as well as across domestic and international markets. However, there is no guarantee of success with this or any other investment strategy.

Market, Security and Regulatory Risks

Via Global in no way guarantees the future performance of any account (or any specific level of performance), the success of any investment strategy or Managers that we may use, or the success of the investment recommendations.

Market Risks

Market Volatility. The profitability of investments substantially depends upon the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. In recent years, investment markets have been prone to greater volatility, which may adversely affect the ability to realize gains at a given point in time.

Material Non-Public Information. If, at any time, principals or employees of Via Global acquire confidential or material non-public information or are otherwise restricted from initiating transactions in certain securities, The Advisor will not be free to act upon any such information. Due to these restrictions, Via Global may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

Use of Derivative Instruments. The price of futures and other derivative instruments may be highly volatile and depend on the value of the securities, indices, currencies, or other instruments underlying them.

Interest Rate Risk. The price of most fixed income securities moves in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities typically falls. If a Client holds a fixed income security to maturity, the change in its price before maturity may have little impact on the security's performance; however, if the security is sold before the maturity date, an increase in interest rates could result in a loss.

Inflation Risk. Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if an investor purchases a 5-year bond in which she can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. Except for most inflation-linked bonds, adjustable bonds or floating rate bonds, the

investor is exposed to inflation risk because the interest rate the issuer promises to pay is fixed for the life of the security.

Non-U.S. Investments. Investing in the financial instruments of companies (and, from time to time, governments) outside of the United States involves certain considerations not usually associated with investing in financial instruments of U.S. companies or the U.S. Government, including political and economic considerations, such as greater risks of expropriation, nationalization, confiscatory taxation, imposition of withholding or other taxes on interest, dividends, capital gains, other income or gross sale or disposition proceeds, limitations on the removal of assets, and general social, political and economic instability; the relatively small size of the securities markets in such countries and the low volume of trading, resulting in potential lack of liquidity and in price volatility; the evolving and unsophisticated laws and regulations applicable to the securities and financial services industries of certain countries; fluctuations in the rate of exchange between currencies and costs associated with currency conversion; and certain government policies that may restrict the Client's investment opportunities. In addition, accounting and financial reporting standards outside of the U.S. may in some emerging markets not be as rigorous as U.S. standards and, consequently, less information may be available concerning companies located outside of the U.S. than for those located in the U.S. As a result, an investment manager may be unable to structure transactions to achieve the intended results or to mitigate all risks associated with such markets. It may also be difficult to enforce the Client's rights in such markets.

Regulatory Risks

Strategy Restrictions. Certain investors may be restricted from utilizing investment strategies or making certain specific investments. For example, private foundations are restricted in their use of investments that may be deemed "jeopardizing investments".

Trading Limitations. For all securities listed on an exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue. Also, such a suspension could render it impossible to liquidate the security.

Security Specific Risks

Liquidity. Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that are traded through an exchange are generally more liquid. Securities traded over-the-counter, or that do not have a ready market, or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation.

Currency. Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Item 9: Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that may be material in the evaluation of Via Global Advisors. Other than described below, Via Global along with Kimberly Clouse have not been disciplined by any governing authority, including any regulatory agency, CFP Board of Standards, or any industry association of which they are licensed and/or are members.

Via Global Advisors, LLC and Kimberly Clouse, its Managing Member, registered with the Commonwealth of Massachusetts as an Investment Adviser and Investment Adviser Representative in 2014. As part of the registration filing, the firm disclosed that its business had begun to operate in 2013. Per a Massachusetts Securities Division Order, the Firm and Ms. Clouse paid back registration fees (of \$350 in total) and administrative assessments (of \$300 in total) for not having registered before the business began to operate the previous year.

Item 10: Other Financial Industry Activities and Affiliations

Via Global's management persons or associated persons are not registered as a broker-dealer or registered representatives of a broker-dealer.

Via Global's management persons or associated persons are not registered as futures commission merchants, commodity pool operators or commodity trading advisors.

Ms. Clouse is an Independent Director of Market Street Trust Company and a member of its Audit and Risk Management and Nominating and Governance Committees.

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

The Advisor strives to observe the highest industry standards of conduct based on its obligation as a fiduciary to its Clients. In an effort to meet this obligation, Via Global has adopted a written Code of Ethics (the "Code") that is applicable to all employees. Each employee will be provided a copy, and is required to acknowledge, in writing, that they have received, read, understand and will abide by, the Code, and the Via Global Compliance Manual, upon commencement of employment and upon any material change to the Code.

The Code requires that employees act in the Client's best interests and comply with applicable laws and regulations. Employees are expected to avoid any action that is, or could even appear to be, legally or ethically improper. The principles outlined in the Code apply to all conduct, whether or not the conduct is also covered by more specific standards or procedures set forth in the Code, Compliance Manual, or elsewhere. Employees are required to bring any violations, actual or suspected, of the Code immediately to the attention of Via Global's Chief Compliance Officer ("CCO"). Failure to comply with the Code may result in disciplinary action or other sanctions including termination of employment.

The Code also places certain restrictions on the personal trading activities of employees and their immediate family members. Employees may generally engage in personal trading only by obtaining prior approval and subject to pre-clearance by the Chief Compliance Officer.

However, employees may purchase and sell open-end mutual funds, designated exchange traded funds ("ETFs"), and any other securities not specifically prohibited by the Code without pre-clearance. Employees are required to disclose their personal securities holdings annually and personal securities transactions quarterly to the Chief Compliance Officer. Employees may also participate in limited offerings such as hedge funds, private equity funds, or other types of private offerings, subject to pre-clearance procedures.

Via Global, its employees or affiliates (collectively "Related Persons"), may have an interest in an investment that may also be recommended to Clients. Policies have been adopted that minimize the possibility that a Client might be disadvantaged because Related Persons hold the same security as the Client. In addition, front-running is a prohibited practice, also Related Persons' trades are not placed in advance of Client account recommendations and trades.

A copy of the Code of Ethics shall be provided to any Client or prospective Client upon request.

Item 12: Brokerage Practices

Via Global may, at a Client's request, recommend a broker-dealer to the Client for the purpose of establishing custody and trading accounts. In making such a recommendation, the Advisor will consider brokers that are likely to provide "best execution." Best execution does not necessarily mean the lowest commission but the best overall qualitative execution in the particular circumstances.

Via Global has no business relationships with broker-dealers other than facilitating the use of their custody and trading platforms for Client accounts. Via Global receives no compensation or “soft dollars” from brokers, custodians or other service providers in connection with Client accounts. Via Global may receive access to systems and services which broker-dealers customarily provide to advisers with Client accounts at such firms at no additional expense to the Advisor or the Clients.

For discretionary accounts, the Client has given express authorization to Via Global to exercise discretion on the Client’s behalf. Via Global is considered to exercise investment discretion over a Client’s account if it can effect transactions for a Client without first having to seek the Client’s consent. Clients may request a limitation on this authority (such as certain securities not to be bought or sold) in writing. Currently, Via Global recommends to Clients with discretionary accounts that they open accounts with one of the brokerage affiliates of National Financial Services LLC, and Charles Schwab & Co. Inc. though the Advisor expects to use other firms in the future as well.

For non-discretionary accounts, the Client shall determine whether to act on the Advisor’s recommendations. The Advisor, with express authorization in writing from the Client in each instance, may effect any specific transactions recommended by the Advisor and approved by the Client through the brokerage platform associated with the Client’s custodial accounts.

Although VGA does not currently bunch or allocate trades it routinely conducts a best execution analysis to ensure that clients are obtaining best execution giving the prevailing market conditions.

Sub-advisors execute trades utilizing their own trading operations and platforms.

Item 13: Review of Accounts

Client accounts are reviewed at least annually to ensure that the current strategy is consistent with the Client’s investment objectives and to consider any changes in a Client’s financial condition and investment goals. Such a review may include the following:

- Asset allocation (overall and by entity) and recommendations for changes, if necessary
- Investment vehicles used to implement allocation and recommendations for changes
- A review of investment performance
- A review of certain other factors relevant to the Client’s financial situation

Such reviews are documented in the Advisor’s files and a written report is prepared for the Client if requested.

Clients are advised to promptly notify Via Global if there are any changes to their respective financial situations or investment objectives or if Clients wish to add or modify any reasonable restrictions to their accounts.

Item 14: Client Referrals and Other Compensation

Via Global has no Client referral or solicitation arrangement with third parties. Via Global does not receive any economic benefits such as sales awards or other gifts from anyone who may provide investment advisory services to Clients. Via Global also does not receive any benefits from anyone who may refer Clients. In addition, Via Global will receive no benefit from any investment advisor for the referral of a Client to such advisor.

Item 15: Custody

Account Statements

The qualified custodians, such as Fidelity, that hold Clients' assets provide account statements directly to Clients at their address of record at least quarterly. Clients are encouraged to carefully review the statements provided by their custodians.

SEC "Custody"

According to the SEC, investment advisers are deemed to have "custody" of Client funds if certain conditions are met. Clients may authorize the Advisor to deduct advisory fees directly from their accounts. Client's funds and securities must be held with a bank, broker-dealer, or other independent qualified custodian. Such an arrangement means that the Advisor is regarded as having limited custody over such Clients' assets. Via Global assures that Clients receive from the independent qualified custodian, at least quarterly, an account statement identifying the value of their investment in the fund and all transactions in the account for that period. The Advisor does not have physical custody of any funds or securities.

VGA is also deemed to have "custody" of client funds if the client has signed a standing letter of authorization ("SLOA") authorizing the Firm to make certain transfers of client funds to third parties not affiliated with VGA. SLOA arrangements are subject to a number of specific safeguards, including (i) the client provides a signed written instruction to the custodian that includes the third party's name, and either the address or account number to which the transfer should be directed, (ii) the client's custodian verifies the instruction and promptly provides a transfer of funds notice to the client, (iii) the client has the ability to terminate or change the instruction, (iv) the investment adviser has no authority or ability to designate or change the identity of the third party or any information about the third party, and (v) the client's custodian reconfirms the instruction annually.

Item 16: Investment Discretion

Via Global has discretionary authority over the selection and amount of securities to be bought or sold in the accounts of Clients that have provided such authority. Transactions in these accounts may be made without obtaining prior consent or approval from Clients, as agreed upon in writing. This authority is granted in the Investment Advisory Agreement, which contains applicable limitations. These purchases, sales, and selections may be subject to the investment objectives, guidelines, or limitations specified by the Client. Via Global will go through a rigorous review of goals, risk tolerance and the development of investment restrictions and guidelines before exercising discretionary authority.

Item 17: Voting Client Securities

As a matter of firm policy and practice, Via Global does not have any authority to vote proxies on behalf of Clients. Via Global will also not provide guidance on how to vote proxies. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in Client portfolios.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because the Via Global does not serve as a qualified custodian and does not require prepayment of fees of more than \$1,200 and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Via Global does not have any financial impairment that will preclude it from meeting contractual commitments to Clients.

Bankruptcy Petition during the Past Ten Years

Not applicable to Via Global Advisors, LLC or Kimberly Clouse.

Miscellaneous

Privacy: Via Global prohibits the disclosure of any Client-related non-public personal information as collected by the firm throughout the Client/firm relationship. However, Via Global may make limited disclosure of such information as authorized by the Client, or as otherwise provided by law. A copy of the Via Global's Privacy Policy will be provided to each Client upon inception of the relationship and annually thereafter.

Business Continuity: Via Global has made preparations via a planning document to expedite the resumption of business in the event of a major disruption. Among other issues, the plan details how Clients may access their accounts in the event of an emergency. A copy of the Business Continuity Plan is available for review by request.