Clear Perspectives Financial Planning, LLC
Firm Brochure

This brochure provides information about the qualifications and business practices of Clear Perspectives Financial Planning, LLC. If you have any questions about the contents of this brochure, please contact us at (513) 469-8400 or by email at: Deb@cpplan.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.

Additional information about Clear Perspectives Financial Planning, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Clear Perspectives Financial Planning, LLC's CRD number is: 146588

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

The following material changes have been made to this document since the last annual updating amendment submitted on March 11, 2020:

- Effective January 2021, the founders of Clear Perspectives Financial Planning, LLC made a decision to change the ownership of the firm. The firm remains 100% employee owned and now has 6 owners: Carol A. Hoffman, Timothy A. Grout, Deborah L. Thocker, Robert W. Bartlett, Katherine M. McInerney, and Michael J. Schelle.
- Item 5 and Item 7: The firm's account minimum was raised to $500,000.
- Item 8: Additional disclosure was added to describe the general risks involved with investing in equities, ETFs, debt securities and mutual funds.
- Item 14: Disclosure was added for solicitation agreements.

Item 3: Table of Contents

Contents

Item 4: Advisory Business

A. Description of the Advisory Firm

This firm has been in business since February 2008, and the principal owners are Carol Hoffman, Timothy Grout, Deborah Thocker, Katherine McInerney, and Robert Bartlett and Michael Schelle.

B. Types of Advisory Services

Clear Perspectives Financial Planning, LLC (hereinafter "CPFP") offers the following services to advisory clients:

Investment Supervisory Services

CPFP offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. CPFP creates an Investment Policy Statement ("IPS") for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

CPFP evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. CPFP will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the IPS, which is given to each client, and transactions are executed according to the parameters defined in the IPS.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Types of Investments

Client assets are normally allocated to mutual funds, equities, bonds, fixed income and debt securities (corporate and government), exchange traded funds ("ETFs"), REITs, or annuities. CPFP may use other securities as well to help diversify a portfolio when appropriate for the client.

C. Client Tailored Services and Client Imposed Restrictions

CPFP offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client IPS which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CPFP from properly servicing the client account, or if the restrictions would require CPFP to deviate from its standard suite of services, CPFP reserves the right to end the relationship.

D. Wrap Fee Programs

CPFP does not participate in any wrap fee programs.

E. Amounts Under Management

CPFP has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$285,169,162	$0.00	December 31, 2020

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Annual Fee
$1- $500,000	1.00%
$500,000-$2,000,000	0.85%
$2,000,000-$4,000,000	0.60%
>$4,000,000	0.50%

CPFP calculates investment supervisory fees using a blended percentage based upon the tiered fee schedule in the table above. These fees are non-negotiable and the final fee schedule will be outlined in the Investment Advisory Agreement. Fees are calculated on the average daily balance of the managed assets for the period. Fees are paid quarterly in arrears, and clients may terminate their contracts with written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract.

The fees charged to clients whose assets have been managed by Clear Perspectives Financial Planning, LLC prior to April 2011 may differ from the rates above.

CPFP performs investment advisory services for various clients. CPFP may give advice and take action in the performance of its duties with respect to any of its other clients which may differ with the advice given or action taken with respect to another client.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in arrears.

Payment of Financial Planning Fees

Fees for financial planning services are included in the Investment Supervisory Fees for assets managed over $500,000.

C. Clients Are Responsible for Third-Party Fees

Clients are responsible for the payment of all third-party fees (i.e. brokerage fees, custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CPFP. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

CPFP does not collect fees in advance.

E. Outside Compensation for the Sale of Securities to Clients

Neither CPFP nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

CPFP does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

CPFP generally provides investment advice and/or management supervisory services to the following Types of Clients:

- Individuals
- High-Net-Worth Individuals

There is an account minimum of $500,000 that applies to clients that receive full financial planning services. This minimum may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

CPFP's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

Charting analysis involves the use of patterns in performance charts. CPFP uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume. **Cyclical analysis** involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

CPFP uses Long Term Trading and Short Term Tactical Strategies. Short Term Tactical Strategies would include changes to client portfolios based on current events such as pandemics, political changes, or other general market disruptions.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Investment Strategies

Long Term Trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

CPFP generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. Here is a summary of those risks:

- *Exchange Traded Funds (ETF)* - ETFs are securities that track an index, a commodity, or a basket of assets like an index fund, but that trade like a stock on an exchange. ETFs experience price changes throughout the day as they are bought and sold.
- *Equity Investment* - Generally refers to buying shares of stocks by an individual or firm in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value; the investment may incur a loss.
- *Market* - The price of a security, bond, or mutual fund can drop in reaction to tangible and intangible events and conditions. External factors cause this type of risk, independent of a security's underlying circumstances. For example, political, economic, and social conditions can trigger market events.
- *Mutual Funds*- Investing in mutual funds carries the risk of capital loss, and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns.
- *Real Estate Investment Trusts (REITs)* - REITs have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.
- *Stock Market* - The market value of stocks will generally fluctuate with market conditions. While stocks have historically outperformed other asset classes over the long term, they tend to fluctuate over the short term because of factors affecting the individual companies, industries, or the securities market.
- *Credit Risk* - The return on fixed income investments (e.g., bonds and preferred stock) is dependent on the issuer of the security meeting its commitment to making

agreed upon payments. Credit risk is the risk that the issuer does not meet that obligation.

- *Interest Rate* - Fluctuations in interest rates will cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither CPFP nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither CPFP nor its representatives are registered as a FCM, CPO, or CTA.

C. Other Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither CPFP nor its representatives have any material relationships that would present a possible conflict of interest to the firm or its clients. CPFP does not have any affiliates.

D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

CPFP does not utilize nor select other advisers or third-party managers. All assets are managed by CPFP management.

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

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Clients or prospective clients may request a copy of our Code of Ethics from management.

B. Recommendations Involving Material Financial Interests

CPFP does not recommend that clients buy or sell any security in which a related person to CPFP or CPFP have a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of CPFP may buy or sell securities for themselves that they also recommend to clients. CPFP will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of CPFP may buy or sell securities for themselves at or around the same time as clients. CPFP will trade client's securities, other than mutual funds, before they trade their own. Under certain circumstances, employees of CPFP may participate in the aggregated trade of securities alongside clients of CPFP. Employees of CPFP will not be favored as far as price or allocations in this type of transaction. CPFP will always act in the best interest of the client.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on CPFP's duty to seek "best execution", which is the obligation to seek to execute securities transactions for a Client on terms that are the most favorable to the Client under the circumstances. CPFP will examine multiple factors, including transaction fees, access to mutual funds, and availability of ETFs. The client will not necessarily pay the lowest commission or commission equivalent, and CPFP may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of CPFP.

TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC is recommended based on its relatively low transaction fees and access to mutual funds and ETFs. CPFP will never charge a premium or commission on transactions, beyond the actual cost imposed by the custodian.

Research and Other Soft-Dollar Benefits

CPFP does not have any formal soft dollar arrangements. CPFP does receive research, products, or other services from custodians in connection with client securities transactions which may be considered soft dollar benefits. There is no minimum client number or dollar number that CPFP must meet in order to receive free research from the custodian. There is no actual incentive for CPFP to direct clients to this particular custodian over other custodians who offer the same services. However, because we do not have to produce or pay for these services or products, we have a perceived incentive to choose a custodian that provides these services based on our interests rather than the clients' interests. The first consideration when recommending custodians to clients is best execution. CPFP always acts in the best interest of the client.

Brokerage for Client Referrals

CPFP receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

CPFP recommends that clients establish brokerage accounts with TD Ameritrade Institutional, a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although our firm may recommend that clients establish accounts at TD Ameritrade, it is the client's decision. CPFP is independently owned and operated and not affiliated with TD Ameritrade. As part of an ongoing improvement effort, CPFP regularly evaluates other broker-dealers/custodians to ensure that we continue to provide our clients with the best overall value. CPFP will manage accounts at other broker- dealer/custodians if the client's retirement funds are required to be retained at that custodian by the employer's retirement plan. This may cost clients money due to higher transaction costs, brokerage commissions, and reduced fund availability in employer directed accounts.

B. Aggregating (Block) Trading for Multiple Client Accounts

Should CPFP decide that aggregating client orders (block trading) for more than one client is in the best interests of those clients, CPFP will effect the transaction and allocate shares from the block trade in a fair and equitable manner. Executing a block trade allows transaction costs to be shared equally and on a pro rata basis among all of the participating clients. If the order is not completely filled, the securities purchased or sold are distributed among participating clients on a pro rata basis or in some other equitable manner.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts are reviewed at least quarterly by a financial advisor. They will review clients' accounts with regards to their investment policies and risk tolerance levels.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive an electronic or written report detailing the client's account at least quarterly. This report will come from the custodian and additional reports are available online or by request.

Clients are offered at least one financial plan concerning their financial situation. Additional reports are provided upon request.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

CPFP does not receive any economic benefit, directly or indirectly from any third party for advice rendered to CPFP clients.

B. Compensation to Non –Advisory Personnel for Client Referrals

CPFP may enter into solicitation agreements pursuant to which it compensates third-parties for client referrals that result in the provision of investment advisory services by CPFP. These solicitation arrangements will be disclosed to affected investors, and any cash solicitation agreements will comply with Rule 206(4)-3 under the Advisers Act. Solicitors introducing clients may receive compensation from CPFP, such as a retainer, a flat fee per referral and/or a percentage of introduced capital. Such compensation will be paid pursuant to a written agreement with the solicitor and generally may be terminated by either party. The cost of any such fees will be borne entirely by CPFP and not by any affected client.

CPFP thanks existing clients that refer new business to the firm with a token gift of appreciation valued at approximately $50.

Item 15: Custody

Client's accounts are held at the Custodian. Clients will receive account statements from the custodian and should carefully review those statements. CPFP custody of client accounts is limited to the direct deduction of fees from client accounts.

Custody is also disclosed in Form ADV because CPFP has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, CPFP will follow the safeguards specified by the SEC rather than undergo an annual audit.

Item 16: Investment Discretion

For those client accounts where CPFP provides ongoing supervision, CPFP maintains limited power of attorney over client accounts with respect to securities to be bought and sold and amount of securities to be bought and sold. All buying and selling of securities is explained to clients in detail before an advisory relationship has commenced. The Investment Advisory Contract established with each client outlines the discretionary authority for trading and clients will execute a limited power of attorney in connection with granting trading authority for the custodian and/or adviser.

Item 17: Voting Client Securities (Proxy Voting)

CPFP will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

CPFP does not require nor solicit prepayment of more than $1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither CPFP nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

CPFP has not been the subject of a bankruptcy petition in the last ten years.