

**Item 1 Cover Page**



**CLEAR VIEW WEALTH ADVISORS, LLC**

Plan Well. Invest Smart. Live Better.

Clear View Wealth Advisors, LLC  
A Registered Investment Adviser

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[www.ClearViewWealthAdvisors.com](http://www.ClearViewWealthAdvisors.com) [www.SmartMoneyRoadMap.com](http://www.SmartMoneyRoadMap.com)  
[www.BabyBoomerRetirementPro.com](http://www.BabyBoomerRetirementPro.com)  
[www.CollegeCashPro.com](http://www.CollegeCashPro.com) [www.ClearViewCollegePlanning.com](http://www.ClearViewCollegePlanning.com)  
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This Form ADV2A ("Disclosure Brochure") provides information about the qualifications and business practices of Clear View Wealth Advisors, LLC ("CLEAR VIEW" or the "Advisor"). Registration as an investment adviser does not imply any particular level of skill or training.

If you have any questions about the contents of this Disclosure Brochure, please contact Steve Stanganelli, Managing Member and Chief Compliance Officer at 978-388-0020 or 617-398-7494 or [Steve@ClearViewWealthAdvisors.com](mailto:Steve@ClearViewWealthAdvisors.com).

The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. This Disclosure Brochure provides information about CLEAR VIEW to assist you in determining whether to retain the Advisor.

Additional information about CLEAR VIEW and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 154094.

## Item 2 Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of CLEAR VIEW. For convenience, we have combined these documents into a single disclosure document.

CLEAR VIEW believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information. CLEAR VIEW encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

There have been no material changes over the past year. As part of the regular course of business, CLEAR VIEW reevaluates its business relationships, technology, and various vendors. Over the course of the past year, this has resulted in changes to the line-up of third-party custodians and various vendors. Aside from reducing operating costs for CLEAR VIEW or reducing fees on investor accounts, none of these changes have had a material adverse impact on clients.

As noted in a previous filing (May 12, 2020), the firm received a Paycheck Protection Plan (PPP) Loan through the SBA in conjunction with the relief afforded by the CARES Act. On June 8, 2021, this loan was fully forgiven by the SBA. The firm used the PPP loan proceeds to continue payroll for the firm for advisory personnel, related benefits, and to cover certain qualifying expenses including rent and utilities for its service locations. The firm did not suffer any interruption of service to clients.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 154094. You may also request a copy of this Disclosure Brochure at any time, by contacting us at 978-388-0020 or 617-398-7494 or [Steve@ClearViewWealthAdvisors.com](mailto:Steve@ClearViewWealthAdvisors.com).

### **Item 3 Table of Contents**

<a href="#"><u>Item 1 Cover Page .....</u></a>	<a href="#"><u>1</u></a>
<a href="#"><u>Item 2 Material Changes.....</u></a>	<a href="#"><u>2</u></a>
<a href="#"><u>Item 3 Table of Contents .....</u></a>	<a href="#"><u>3</u></a>
<a href="#"><u>Item 4 Advisory Business.....</u></a>	<a href="#"><u>4</u></a>
<a href="#"><u>Item 5 Fees and Compensation.....</u></a>	<a href="#"><u>11</u></a>
<a href="#"><u>Item 6 Performance-Based Fees and Side-By-Side Management .....</u></a>	<a href="#"><u>17</u></a>
<a href="#"><u>Item 7 Types of Clients .....</u></a>	<a href="#"><u>18</u></a>
<a href="#"><u>Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.....</u></a>	<a href="#"><u>19</u></a>
<a href="#"><u>Item 9 Disciplinary Information .....</u></a>	<a href="#"><u>21</u></a>
<a href="#"><u>Item 10 Other Financial Industry Activities and Affiliations.....</u></a>	<a href="#"><u>22</u></a>
<a href="#"><u>Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</u></a>	<a href="#"><u>23</u></a>
<a href="#"><u>Item 12 Brokerage Practices.....</u></a>	<a href="#"><u>25</u></a>
<a href="#"><u>Item 13 Review of Accounts .....</u></a>	<a href="#"><u>26</u></a>
<a href="#"><u>Item 14 Client Referrals and Other Compensation.....</u></a>	<a href="#"><u>27</u></a>
<a href="#"><u>Item 15 Custody.....</u></a>	<a href="#"><u>28</u></a>
<a href="#"><u>Item 16 Investment Discretion .....</u></a>	<a href="#"><u>28</u></a>
<a href="#"><u>Item 17 Voting Client Securities .....</u></a>	<a href="#"><u>29</u></a>
<a href="#"><u>Item 18 Financial Information .....</u></a>	<a href="#"><u>29</u></a>
<a href="#"><u>Item 19 Requirements for State-Registered Advisers.....</u></a>	<a href="#"><u>29</u></a>
<a href="#"><u>Brochure Supplement .....</u></a>	<a href="#"><u>31</u></a>

## Item 4      **Advisory Business**

Clear View Wealth Advisors, LLC (“CLEAR VIEW” or the “Advisor”) is a single member-managed Limited Liability Company (“LLC”) organized in the Commonwealth of Massachusetts on May 17, 2010 to provide financial planning and investment management services to individuals, families, organizations, and business entities on a “fee-only” basis. The fiscal year end is December 31 of each year.

As a “fee-only” adviser, we do not receive compensation from any third party in the form of referral fees, indirect or hidden fees or commissions.

Steven J. Stanganelli, CFP®, CRPC®, AEP®, CCFS®, CCFC® of Amesbury, Massachusetts is the General Manager and Managing Member of the Advisor.

We do not provide legal advice and encourage you to consult with an attorney or other professional for drafting or legal advice. While the company offers income tax preparation services, you do not have to use this service and you may seek competent accounting or tax advice from any professional of your choosing.

Most of our time is involved in managing investment accounts (25%), supervising investment accounts (5%), providing investment advice on a periodic schedule (5%), furnishing financial planning advice to Clients not involving securities or investments (50%) and income tax preparation services to Clients (15%).

### **Advisory Services for Individuals:**

#### Financial Planning Overview

We offer a range of advisory services. We offer comprehensive and modular advisory services to individuals that can include help with cash management (including budgeting, paying off debt and managing credit), risk management (i.e. insurance needs and planning), investment planning (such as investment advice, supervisory services, and/or portfolio reviews), tax preparation, retirement planning, estate planning and/or special situations such as college funding, divorce planning, stock option strategies, evaluation of mortgage, real estate and investment options and financial education programs. Services can be ongoing or limited in time and scope. Planning services are tailored to your specific needs. Advice may be provided in written reports or other electronic or telephonic communications with you.

Before we begin a planning or consulting assignment, we will complete an appropriate written agreement with you outlining the scope of the project, the role and responsibilities for you and CLEAR VIEW, and compensation due to us.

The time it takes to complete a project will vary by Client. Typically, we will present you with a plan within ninety (90) days of the date of our service agreement if you have supplied us with needed information. Some projects may take longer.

### Comprehensive Planning

You may hire us to complete a comprehensive financial plan. Such a plan will incorporate information gathered through personal interviews and includes your current financial status, future goals and attitudes toward risk. In general, the plan may include the following topics or areas of concern:

- Optimizing cash flow to efficiently meet savings and debt repayment goals
- Overall investment planning including personal risk assessment and recommending a corresponding asset allocation
- Evaluation of insurance needs with appropriate product or strategy recommendations
- Estate planning tools and tactics
- Retirement goal planning or sustainable withdrawal strategies

Comprehensive plans include at least one scheduled check-up during the year. You may also call or email throughout the year for help with clarifying questions or about implementation.

Financial planning recommendations are not limited to any specific product or service offered by a broker dealer or insurance company. Implementation of any recommendations is solely at your discretion.

### Modular Plans

You may choose this option if you want to focus on two or more specific areas for advice and do not want a comprehensive plan.

The topic areas that you may choose include:

- Cash and debt management
- Budgeting
- Investments and Asset Allocation
- Insurance and Risk Management
- Estate Planning
- Education Planning
- Tax Planning including Stock Options and sale of highly appreciated assets
- Retirement Planning and Income Strategies

This plan option provides you with a limited amount of time with an adviser throughout the year in person, on the phone or by email. You may also be provided with financial education and resources to help you implement recommended actions on your own.

### Strategy-Sessions and Evaluation Meetings

Planning services may focus on one or more topics during a limited meeting with limited follow-up or reports.

### WealthCare Planning Bundles

We also offer planning services that include a combination of topic areas with specific recommendations and applicable reports.

Portfolio Lab Analysis: This project provides an analysis of a client's holdings in all taxable and retirement accounts with detailed risk and performance metrics. A comparison is provided with alternate allocations or investments that may better align with a client's goals and risk tolerance.

WealthCare Financial Wellness Tune-Up: This project provides a broad assessment of a client's financial strengths and weaknesses. It includes specific recommendations and checklists as well as applicable reports covering a broad range of areas.

RetireRight Retirement Readiness Reality Check-Up: This project provides a detailed assessment of a client's projected retirement goals, cash flows, investments, and taxes. It includes a Financial Wellness Tune-Up and Portfolio Lab Analysis. Social Security benefit claiming strategies are provided. A limited number of retirement reports are provided illustrating the probability of success of different retirement lifestyle and investment assumptions.

WealthCare Signature Retirement Plan: This package is ideal for those in or approaching retirement. It expands on the RetireRight Retirement Readiness Reality Check-Up with additional retirement testing reports and analysis, and more robust portfolio, tax and estate planning.

WealthCare Signature Review Plan: This package is ideal for any client seeking an objective assessment of current financial position and answers key questions about how to improve your bottom line and allocate your self-directed investments. It includes the Financial Wellness Tune-Up, Portfolio Lab Analysis with personalized recommendations for investment changes, and tax planning.

WealthCare Bronze, Silver, Gold, or Platinum Planning Programs: These packages combine a Financial Tune-Up with more in-depth analysis on two, three, or four or more key topic areas and may be integrated with retirement analysis. The difference between them will be the number of key topics chosen and reports provided.

#### Annual Review & Advisory Program

If you choose this program, we will provide an update to your comprehensive or modular plan and additional semi-annual check-ups with an additional block of time for consultation plus email or phone support during the year on questions about related issues and implementation at a preferred hourly rate or negotiated flat fee.

#### Limited Scope Plans

If you need detailed evaluation, research or recommendations on a specific financial issue, you may want a limited scope plan that is tailored to a single-issue. This option is ideally suited for consulting on preparing a budget or financial aid application, evaluating retirement readiness, choosing employer-sponsored benefits or evaluating mortgage options or retirement benefits.

#### TaxSmart Tax Service Bundles

You may choose us to help you prepare and file your personal, business, estate, or trust tax returns. You may combine this service with limited planning support and analysis on one or more topic areas.

#### Special Service Areas

We offer Clients help in special areas, namely Divorce Financial Planning, College Funding Strategies and Senior Assistance.

Divorce Financial Planning: We will assist you and your chosen legal counsel in evaluating asset settlement options, valuing pension benefits, and the division of property and investment accounts as well as alimony and spousal support options.

We make every effort to evaluate your personal assets, determine your spouse's assets, and analyze the value of shared assets, such as your house and securities. This type of analysis will include the tax impact of property settlement options and recommendations.

College Funding Strategies: We will advise you about your options to fund education for your children or grandchildren. We will help you determine the funds needed and advise on ways that may improve your ability to obtain merit- and needs-based aid through various tax, income and asset strategies. These services may be marketed under our trade name CollegeCashPro.com.

“Senior Helper” Senior Assistance: Through this program we can assist seniors and caregivers by evaluating health care options or government benefits and prepare plans to help protect estates through various gifting strategies, estate planning tools and insurance options.

Advisor Support Retainer Program:

You may choose to reserve a block of time with CLEAR VIEW to discuss by phone or email any financial topic or question that you may have throughout the year. Throughout the year you will also have complimentary access to financial education programs and resources that we may arrange for Clients. This program can be reserved in increments of three-hour blocks. The service can be combined to supplement any other planning service or be a stand-alone option.

Other Personal Financial Consulting

We may also provide consulting services to consumers in response to specific questions asked by email or through online platforms.

**Advisory Services for Organizations and Business Entities:**

Your organization can engage us to provide financial education group workshops to employees, members or group participants. These programs are also designed to be compliant with certain Department of Labor “safe harbor” provisions.

An additional option can be added to provide a block of time to meet with non-owner and non-management employees to review their personal situation and provide specific recommendations and action items.

**Client Responsibilities and Options for Financial Planning Services:**

You are not required to engage the services of any professional we may recommend. You retain absolute discretion over implementation of any recommendations, and you are free to accept, reject or ignore any advice we may provide.

In order for us to provide you with appropriate advice, you need to provide us with accurate and complete information as may be needed such as accurate income, asset, and tax documentation. You will also need to identify your investment objectives, risk tolerance, any investment restriction(s) or material changes that may impact your income or tax status. From time to time, this information may need to be updated.

## **Investment Services:**

We offer a range of ongoing and periodic investment advisory services that may be tailored to your needs and any specific investment restrictions you request.

### Active with Discretion – The MarketFlex Investment Program

You may choose us to provide ongoing active management that includes monitoring, rebalancing and trading services to implement a program that meets the guidelines you provide us in your Investment Policy Statement (IPS) or risk profiles or similar instructions. For these programs we will charge you an asset management fee (see Discretionary Investment Advisory Services).

### Automated Core Investment Platform powered by Betterment for Advisors

You may choose to invest in a basket of Exchange Traded Funds (ETFs) selected in an allocation that is based on your goals, time horizon and risk tolerance. This service is powered by algorithms developed by Betterment for Advisors (f/k/a Betterment Institutional), part of Betterment LLC, an Unaffiliated Money Manager. This third-party investment adviser, commonly referred to as a robo-advisor, provides investment selection, rebalancing and tax-harvesting for individual or entity accounts only using ETFs.

### Periodic Advice: The iMonitor Program and 401(k) Monitor Program (Non-Discretionary)

You may want guidance and recommendations on a periodic basis. We will help you assess your risk tolerance, determine an appropriate asset allocation and provide you with certain rebalancing or trading recommendations for you to implement. This may be used for help with your qualified plans.

### Periodic Advice - Participant Account Management: 401(k) Advisory Option (Discretionary)

You may want more active management and rebalancing of your held-away employer-sponsored retirement accounts. We may use a third-party platform (Pontera fka FeeX) to facilitate management of these held-away assets with discretion delegated to us by you. By using this platform, we do not have custody of your funds since we do not have direct access to any client log-in credentials. But with your permission, we can use this platform to view your accounts and adjust allocations or trade investments if we deem it appropriate for your goals, risk tolerance, and prevailing market conditions or economic trends. The goal of this service is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance.

### Recommendations for the Active Investor – The Money Tools Investment Service

If you want to handle all trading and rebalancing and need investment ideas and portfolio analysis services, we will provide you with recommendations and portfolio analytics on a regular basis on mutual funds and Exchange Traded Funds to use in your portfolio. The fee for this may be 0.25% of assets or a flat rate to be negotiated. If you accept the recommendations, you will be responsible for implementing them on a trading platform of your own choosing.

### Unaffiliated Money Managers and Investment Programs

We may recommend that all or a portion of a Client's investment portfolio be managed by one or more unaffiliated money managers or investment platforms (collectively "Unaffiliated Managers"). In such instances, the Advisor will research and recommend the selection of the Unaffiliated Managers and allocate the appropriate portion of your assets based on your personal needs and goals. CLEAR VIEW serves as your primary advisor, but the Unaffiliated Manager[s] will have the discretionary



authority to implement the selected strategy[ies] according to their investment mandates. The Client may be able to impose reasonable restrictions on these accounts, subject to the terms of the agreement[s] with these parties. If you use one or more of those programs, your overall fee may include our advisory fee, plus the fee[s] of the Unaffiliated Manager[s]. Some third-party money managers are also financial technology firms and may provide these services as part of service arrangements to which CLEAR VIEW may be subscribed. Please see Item 5 below.

Note on Automated Third-Party Investment Services

From time to time, we make contractual arrangements with unaffiliated third-party money managers, turnkey asset management programs and advisers who we believe offer value to a Client's particular situation. Services may be provided by firms that utilize algorithms to determine investment allocations.

At this time, we have made contractual arrangements with Betterment for Advisors (FKA Betterment Institutional), part of Betterment LLC, which is sometimes referred to as a 'robo-advisor', an online-only registered investment adviser as well as Altruist LLC.

It is our judgement based on our research that firms like these augment our own capabilities in researching, implementing and rebalancing Client portfolios.

We choose such firms because of their reputation and alignment with our core investment philosophy of index-based investing using low-cost index Exchange Traded Funds.

We also believe that these firms may add value using proprietary tax-harvesting programs or technology to automate the account-opening, investment selection and rebalancing processes. We believe that all of these advantages coupled with professional management provide value to you by saving you and us time in getting you properly invested in a timely way. And the platform may also save you on fees compared to other options available through our firm or our peers.

Although some of these advisers may limit investments to a select list of low-cost Exchange Traded Funds, we believe that the broad nature of these index funds make them appropriate for an investor seeking a globally diversified, low-cost and tax-efficient portfolio. If you as a client desire or need access to other types of investments or asset classes such as stocks, bonds and closed-end funds, then we suggest utilizing a different trading platform, which has access to these for our MarketFlex Portfolio recommendations.

In the case of Betterment for Advisors, your fee for our services is generally 0.40% per year. (See "Unaffiliated Money Managers" above and Item 5 below).

You may directly choose to enroll and engage the services of an online-only registered investment adviser like Betterment. While you may choose to directly enroll and engage the services of an online-only registered investment adviser at a slightly lower cost that saves you our fee, you will not have access to the services that we may be able to offer you. Online-only investment advisers such as Betterment are not typically capable of providing advice outside of the area of investments. Because they do not have a personal relationship with you nor have access to your complete financial picture and goals and may not be familiar with your specific tax situation, they may not be able to provide recommendations or advice that are relevant to you and your situation. More often than not, you will not have access to a CERTIFIED FINANCIAL PLANNER™ Professional who is trained to assist you with

broader financial matters such as education funding, divorce settlement analysis, retirement income projections or tax and cash flow planning.

Because we are familiar with your broad financial situation and personal goals, we can augment the investment-only decisions of the online-only adviser with knowledge of your financial resources and goals from our ongoing reviews. We also are capable of providing updates to your financial plan and model the impact on your ability to meet your stated goals. We also are able to offer advice on non-investment financial matters such as cash flow budgeting, producing pro forma tax projections, and monitoring your investments across platforms.

Although we are unable to modify the investments available from Betterment, we do help you choose or change your portfolio. As part of our services, we use multiple tools to assess your risk tolerance and then reconcile these results with the recommendations offered by the online automated investment platform. As your goals change, we may also recommend changes that override the recommendations of the online adviser. We also monitor the effectiveness of the online-only investment adviser to determine if you should change to a different platform, third-party manager or investment strategy.

#### Assets Managed

As of December 31, 2022, we managed approximately \$9,474,009 in sixty-three (63) active accounts for thirty (30) households (\$9,457,269) and one 401(k) pension/profit-sharing plan (\$16,740). Of this total, all \$9,474,009 was managed on a discretionary basis and no accounts were managed on a non-discretionary basis.

These accounts were invested in the following types of securities in the approximate proportions and amounts noted:

- 58.23% (\$5,516,485) in Exchange-Traded Funds (equity and bond)
- 7.96% (\$754,478) in Individual Stock
- 7.94% (\$751,979) in non-traded REITs
- 2.82% (\$267,595) in Individual Bonds (all in US State and Local Bonds and 0% Corporate Debt)
- 11.28% (\$1,068,217) in Open-End Mutual Funds (Securities Issued by Registered Investment Companies)
- 3.49% (\$331,109) in Closed-End Mutual Funds (Securities Issued by Registered Investment Companies)
- 8.28% (\$784,138) in Cash and Cash Equivalents

#### Clients and Services

During 2022 we provided services including advice or analysis on one hundred-thirty (130) client projects for eighty-nine (89) distinct client households. These clients represented aggregate household asset value in excess of approximately \$45,000,000 in real estate and \$40,000,000 in securities held-away in both brokerage accounts and employer-sponsored plans. This included thirty-six (36) comprehensive or modular financial planning projects and ninety-four (94) discrete tax preparation and tax planning projects plus thirty-five (35) investment management client households noted above. Some clients used us for multiple services.

## Item 5 Fees and Compensation

### **Fees for Financial Planning and Non-Investment Related Consulting:**

All fees are negotiable. Planning fees may be based on an hourly rate ranging from \$100 to \$300 per hour depending on reported client income and net worth. Alternatively, you may pay us a fixed fee based on the project illustrated below. For more complex and involved projects like the WealthCare Silver, Gold, or Platinum programs, you may pay a fixed fee based on a percentage of your income and net worth. Fees are dependent on the scope of the project and complexity of your asset, income and tax situation. After we have had an opportunity to review your situation, the complexity of what you need addressed, and the time involved, we will provide you with a proposed fee structure.

Financial planning services may range from \$300 to more than \$25,000 depending on the project scope, level of complexity, and professional time involved. Fixed-fee options are available as follows:

- Evaluation meetings are offered at a fixed fee of \$360.
- General Strategy Sessions start at \$800 / College Planning Strategy Sessions start at \$750
- WealthCare Tune-Up starts at \$2,800 including annual support
- College financial planning modules with reports begin at \$750
- RetireRight Retirement Readiness Reality Check-Up is offered at \$3,000
- Portfolio Lab Analysis starts at \$600 (up to \$300,000 of investment assets)
- TaxSmart Tax Service Bundles start at \$800 plus a fixed fee for each financial topic chosen
- WealthCare Signature Reviews start at \$4,500 \*
- WealthCare Signature Retirement Reviews start at \$5,500 \*
- WealthCare Platinum Comprehensive Plans with investment management start at \$7,500 \*

\*Fixed-fee projects based on income and net worth will generally be based on the following plus an administrative fee to be determined by the project selected (ranging from \$300 to \$1,000):

- Income: 0.5% to 2% of net reported income
- Net Worth: 0.15% to 0.50% of reported net worth

#### Planning Agreement

If you agree, then we will complete a Financial Planning Service Agreement and collect a deposit that will be applied to the total balance. As outlined in the Agreement, we will collect a portion of the balance at other predetermined points during the engagement or as work is completed.

We will not request or accept advisory fees equal to or greater than \$500 for services to be performed six months or more in advance.

#### Terminating an Agreement

Either party may terminate the financial planning agreement by providing advance written notice to the other party. You also have the right to cancel an agreement with us within five (5) business days of the effective date of the agreement and you will not owe us any fee for services and your deposit will be returned.

If you cancel the agreement after this time but before a data gathering review meeting or conference call, we may waive the balance of any fee due to us. If you cancel the agreement after the first five (5)

business days, you may owe us for the time and expense we may have incurred but this will not exceed the original proposed amount.

If we present you with an invoice, you agree to pay this invoice within ten (10) business days of receipt. Interest and collection costs may accrue on unpaid balances.

Method of Payment

Fees may be paid by check or major credit card or other electronic remittance service.

**Fees for Discretionary Investment Advisory Services:**

You may choose us to provide on-going management, monitoring and implementation of investment recommendations. These services require a written agreement as well. For these services, we offer three options for payments: Tiered Asset Management Fee, Flat Rate or Flat Fee Bundle.

Tiered or Flat Rate Asset Management: Fees are paid monthly as a percentage of assets managed calculated on the ending balance for your account from the prior month. A pro rata daily rate may be used for accounts which have been open for only a portion of the prior month.

Your fee may be higher or lower from month to month if you deposit or withdraw money from your account[s] or there are changes in your account balances because of market movements or the posting of interest and dividends.

Payment of Asset-Based Fees

Generally, when we establish your account, we ask that you provide the Custodian with written permission to remit to us our fee each billing period (usually monthly but based on the custodian) from funds in your account[s]. You will receive an invoice from the custodian during each billing cycle. Alternately, you may choose to pay these fees directly and we expect payment within ten (10) business days of receipt of our invoice.

Pro Ration of Account Fees

If you open or close an account within any given calendar month, we will charge the asset management fee on a pro rata daily basis for the time we are managing the account.

Tiered Asset Management Annual Fee Schedule

\$0 to \$20,000	Negotiated annual charge subject to \$240 minimum
\$20,001 to \$70,000	1.75%
\$70,001 to \$200,000	1.50%
\$200,001 to \$500,000	1.20%
\$500,001 to \$750,000	1.00%
\$750,001 to \$1,000,000	0.80%
\$1,000,001 to \$1,500,000	0.60%
\$1,500,001 to \$3,000,000	0.45%
Above \$3,000,000	Negotiable

The effective fee that applies to your portfolio is based on a blended rate applied to the total of all accounts in your household that we manage for you that fall within each dollar range listed above.

Flat Rate Asset Annual Fee Schedule

\$0 to \$400,000	0.80%
\$401,000 and above	0.60%

This option is offered in conjunction with a flat rate financial or tax planning program.

Fixed-Fee Investment Management with Planning Services

We also offer discretionary investment management services based on investable assets and net worth that may be combined with certain limited-scope planning services such as tax preparation and planning (TaxSmart), and/or a financial review (Financial Wellness Check-Up); additional planning modules may be combined for an additional fixed fee. This fee schedule is in effect for client assets held in custody with Apex Clearing on the Altruist platform:

- For investment accounts or net worth from \$600,000 to \$699,999: \$350/month
- For investment accounts or net worth from \$700,000 to \$799,999: \$400/month
- For investment accounts or net worth from \$800,000 to \$999,999: \$500/month
- For investment accounts or net worth from \$1M to \$1.299M: \$600/month
- For investment accounts or net worth from \$1.3M to \$1.499M: \$750/month
- For investment accounts or net worth from \$1.5M to \$3M: \$800/month
- For investment accounts or net worth from \$3M+ to \$4M: \$1,000/month
- For investment accounts or net worth from \$4M+ to \$5M: \$1,200/month
- For investment accounts or net worth > \$5M: Please call

Fee Rate Used with Third-Party 'Robo-Advisor' or Automated Online Investment Platforms

We charge a flat rate when you choose to utilize the Betterment automated investment platform (commonly referred to as a 'robo-advisor'). Our fee for investment advisory services will be 0.40% per year and the fee assessed by the third-party unaffiliated investment manager and adviser will be 0.25% per year.

These fee schedules list the maximum rates that a Client may pay. Since fees are negotiable, some Clients may pay us based on lower rates than those listed.

To cover certain administrative and reporting expenses, you may also pay a monthly maintenance fee of \$10 per account for any part of a month with a maximum expense per household of \$30. These fees may be waived at the Advisor's discretion. If this is applicable, it will be disclosed in your agreement.

WealthCare Total Management Service (Platinum Level): Flat Rate Annual Fee Bundle

You may choose to have us provide a combination of services during the year at a negotiated flat rate with a minimum fee of \$6,700 per year. The fee will be based on a percentage of your net worth and net income. Third-party service fees and tax preparation fees may also be added. These services may include financial planning services as described above as well as personal income tax preparation and investment services on a discretionary or non-discretionary basis.

The total fee is calculated based on a rate of \$2,500 Base Fee Plus:

- For investment accounts or net worth from \$600,000 to \$699,999: \$350/month
- For investment accounts or net worth from \$700,000 to \$799,999: \$400/month
- For investment accounts or net worth from \$800,000 to \$999,999: \$500/month
- For investment accounts or net worth from \$1M to \$1.299M: \$600/month
- For investment accounts or net worth from \$1.3M to \$1.499M: \$750/month
- For investment accounts or net worth from \$1.5M to \$3M: \$800/month
- For investment accounts or net worth from \$3M+ to \$4M: \$1,000/month
- For investment accounts or net worth from \$4M+ to \$5M: \$1,200/month
- For investment accounts or net worth > \$5M: Please call

We will provide you with a financial plan and advice throughout the year on one or more topics that you indicate in the planning agreement. We will also include the Advisor Support program described above (see Item 4, page 6) so that you have access to advice on other financial matters throughout the year. You may also choose to include tax preparation and planning services.

We will supervise and direct on a discretionary basis that portion of your investments that you delegate to us to manage for you in accordance with the Investment Policy Statement that you provide us.

And we will provide at your request periodic support, research, advice and recommendations for you to use at your discretion on that portion of your assets (including in-service qualified plans) which you may choose to implement on accounts held away with other broker-dealers/custodians.

We will provide this combination of services for a flat fee negotiated in advance. Your fee may be paid monthly or quarterly and not vary regardless of the value of assets held in your account[s]. You will still be responsible for applicable third-party fees.

#### Fee Schedule for Investment Advisory Services for In-Service Qualified Plans

We generally offer a reduced management fee schedule for funds “held-away” in your company-sponsored plan or on other custodial platforms. This fee is negotiable and will be outlined in our agreement.

#### Fee Billing

Investment advisory fees are calculated by the Advisor or its delegate, the Custodian, and deducted from the Client’s account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client’s account[s] at the respective month end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with CLEAR VIEW at the end of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor or its delegate will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the

methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting CLEAR VIEW to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Other Costs and Fees

Clients may incur certain fees or charges imposed by third parties, other than CLEAR VIEW, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the Custodian and executing broker-dealer. The fees charged by CLEAR VIEW are separate and distinct from these custodial and execution fees.

In addition, all fees paid to CLEAR VIEW for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of CLEAR VIEW, but would not receive the services provided by CLEAR VIEW which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by CLEAR VIEW to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

NOTE: Most of the mutual funds that we may select do not charge a 'load' or commission. Some funds waive their 'load' fees because we are using the fund in a fee-based advisory program that we will implement for you. Some funds may have a nominal ticket charge or transaction charge as noted above.

#### Comparable Services

You may be able to obtain comparable services through alternative providers, which may cost more or less. For instance, you may invest directly with a mutual fund family or through a broker dealer or 'robo-advisor' of your choice. If you do, you would not receive the services we provide which are designed, among other things, to assist you in determining which investments are most appropriate for your financial condition and objectives.

When we evaluate investments and alternatives for a Client, fees are only one criterion we will use. We may decide to use an investment or course of action that may result in some of these costs being higher than alternatives. We may determine that potential results may justify the additional costs incurred because of the potential for lower risk, enhanced performance or other benefits that we feel may be in your best interests.

#### Other Compensation

We do not sell securities, insurance or annuities nor receive any incentive or referral fees to recommend particular investment products, strategies or services of other professionals. When deciding on a product, investment strategy, investment manager or course of action, we are focusing on your needs in the context of the information you provide to us.

#### Unaffiliated Money Managers and Investment Programs

Where we believe it would be in your best interests, we may recommend that you allocate all or a portion of your assets to an Unaffiliated Manager (as described in Item 4). Under these arrangements, we generally receive our management fee for overseeing your investments, including the initial and ongoing due diligence over the Unaffiliated Manager[s]. The Unaffiliated Manager[s] also may charge their management fee and/or platform fees for their services over any assets placed under their discretionary authority. Typically, the Unaffiliated Manager[s] will calculate and collect our fee along with their fees and remit to us our portion of the overall fee. CLEAR VIEW may reduce its overall fee when utilizing Unaffiliated Manager[s]. Please see Item 10 for additional details.

#### Terminating an Agreement

CLEAR VIEW is compensated for its services at the end of the month after investment advisory services are rendered. Either party may terminate the investment advisory agreement by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.



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

CLEAR VIEW does not charge performance-based fees for its investment advisory services. The fees charged by CLEAR VIEW are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

CLEAR VIEW does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7      Types of Clients**

CLEAR VIEW makes available its full suite of advisory and investment management services to individuals, pension and profit-sharing plans, trusts, estates or charitable organizations, and corporations or other business entities.

We cater primarily to individuals and couples as well as divorced and widowed individuals in need of trusted guidance while going through life-changing transitions. Clients range in age from 30 to 80.

We also strive to make our planning services accessible to those who are busy launching their careers or growing their families. So, we offer several non-investment financial planning services that are conveniently accessible using contemporary technology and are reasonably priced.

We strive to be a trusted advisor working with a select group of individuals who include business owners, professionals, entrepreneurs, and pre-retirees and retirees from diverse fields with an emphasis on education, engineering, law, manufacturing, marketing, medicine and allied health professions, nursing, real estate, and technology.

### Conditions for Managing Accounts

There is no precondition requiring that we manage your investments when you choose any of our financial planning services.

We do not generally impose a minimum level of assets for opening or maintaining an investment advisory account.

While we do not set a minimum asset level on accounts, there may be a minimum fee, which we will negotiate with you and disclose in the appropriate service agreements. Please refer to Item 5 for additional details.

Some third-party investment managers as well as mutual fund providers may have minimum balance requirements in order to utilize their services or purchase their funds. This will be disclosed in any applicable investment sub-advisory agreement or prospectus.

We strive to have mutually beneficial and respectful relationships with Clients. Before we accept you as a client, all applications are reviewed by our management. Our decision to work with you will be based on several qualitative factors such as your legal capacity to engage us, your goals and objectives, the scope of your planning project or account size, the adequacy of the expected fees for the services you seek as well as your expectations and personality.

## **Item 8      Methods of Analysis, Investment Strategies and Risk of Loss**

### Approach to Investing

We believe that Clients win by not losing; so, our emphasis is on managing risks in a Client's portfolio using a combination of diversification, asset allocation (strategic and tactical) and management styles (active and passive) as well as available hedging strategies.

We will combine these elements to create an overall portfolio and strategy aligned with your investment policy statement and specific to your needs, time horizon, risk tolerance and risk capacity.

We practice strategic asset allocation (SAA) which is based on the general principles of Modern Portfolio Theory (MPT) to develop, monitor and manage a portfolio that balances risky assets (like equities) with less risky assets (like debt instruments).

We may couple this with tactical buying and selling decisions based on market conditions and trends identified. Or we may utilize funds that employ such tactical strategies.

Our goal is to build globally diversified, tax-efficient portfolios that combine passive and active management investment styles.

We will build or use models developed by third-party investment managers that combine a core strategic allocation using individual securities, mutual funds, exchange traded funds (ETFs) or other investments that may be supplemented with tactical trading programs or funds offered by other investment manager resources.

In selecting securities and investments, we generally prefer low-cost options, whether actively or passively managed, except in cases where historical return or risk-adjusted measures or projected income or yield warrant higher expenses.

We typically recommend professionally managed investment products like low-cost mutual funds (actively or passively managed) and exchange traded funds (ETFs). For the fixed income portion of a portfolio, we will use bond mutual funds or ETFs but prefer to use individual bonds if a Client has sufficient assets to make this a feasible option.

Some of the investment vehicles that we may utilize include: No-load (no-commission) or load-waived (commission-waived) mutual funds (open-end or closed-end), exchange traded funds (ETFs), stocks, bonds, Treasuries, bills, notes, certificates of deposit and money market accounts.

### Methods of Analysis

We generally will utilize information resources made available to us through our custodial brokerage arrangements which may include financial news resources, charting tools and mutual fund analysis tools provided by Lipper and Morningstar.

We use various tools to determine the risk and performance metrics of individual investments and compare the risk/return profiles with alternate investments in a total portfolio.

We will also use information from publicly available print and online media sources. We will utilize research materials available through professional trade organizations or offered by investment managers in conference calls, trade shows, and presentations. We also subscribe to various informational websites and online services offering commentary and analysis on news events as well as on Exchange Traded Funds, mutual funds and stocks.

We may utilize model portfolios or investment services offered by third parties. We will review the methodology and risk-adjusted historical returns to determine if these services are appropriate for use with our Clients.

#### ETFs:

In selecting an Exchange Traded Fund, we will consider the liquidity and trading volume of the ETF and/or its component parts. We will also seek out ETFs that offer low overall internal expenses and are tax efficient.

#### MUTUAL FUNDS:

In selecting a mutual fund, we will consider the following general screening criteria:

- Age of fund: Generally, over 4-year operating history or track record of manager or strategy
- Expenses of fund: Generally, in lower half compared to peers
- Longevity of Management Team: Generally, prefer consistent management and will reconsider use if there is a significant change
- Risk-Adjusted Returns: Generally, equal to or exceeding the fund's benchmark
- Rankings: Generally, equal to or more than three stars as ranked by Lipper or Morningstar
- Risk Statistics: We will review both standard risk measures like standard deviation as well as measures focused on downside drawdowns, beta, and Sortino Ratio. Preference will be given to funds that offer better overall measures of historical risk.

#### Investment Strategies & Risk Controls

ETF and equity positions may be managed for risk using "trailing stop-loss" orders which effectively place a floor under each position that triggers a sale of some or all of the position if a lower limit is reached. This lower limit increases as the value of the underlying ETF or equity position increases so that gains that have been achieved can be locked in. We may also use ETFs or mutual funds that focus on option-hedging strategies.

For mutual fund positions, we may monitor the underlying price and volume momentum of trading activity which may provide a signal to tactically sell or buy positions. Or we may use mutual funds that are classified as "market neutral" or "long-short" to mitigate market trends.

We may increase the use of tactical money managers on accounts. We may also increase cash positions above our 2% - 5% portfolio target if we feel this is warranted to avoid market volatility.

#### Risk of Loss

While diversification may help to lower a portfolio's overall volatility, investing in securities always involves risks that Clients should be prepared to bear. Investments in equities or bonds are at risk of loss of principal. All such investments are not guaranteed.

## Item 9      Disciplinary Information

**There are no legal, regulatory or disciplinary events involving CLEAR VIEW or any of its management persons.** CLEAR VIEW values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 154094.

In addition, Clients may also obtain information relating to the disciplinary history of any investment advisor representative conducting business in Massachusetts by contacting the Commonwealth of Massachusetts Securities Division at (617) 727-3548.

## Item 10 Other Financial Industry Activities and Affiliations

Our primary business activity is acting as a financial adviser or investment manager for clients like you.

We do not actively engage in business as a:

- Registered representative of a broker-dealer
- Insurance broker or agent
- Bank or banker
- Real estate broker, dealer or agent
- Financial product salesperson

The Adviser operates an income tax preparation service (doing business as Boston Tax Planners). We believe that this service will require about 10% to 20% of professional time during the year. Services are offered on a fee basis, and you are not required to use these services in order to use our financial planning or investment services.

The Principal of the Adviser holds a real estate sales license, which is inactive. The Principal at one time held an insurance producer license and securities license, which have expired. These licenses are inactive and not required in our business model as fee-only financial advisors and planners. No referral fees, trails, or residuals are received by either the Adviser or its Principal.

We are not affiliated with any other bank or other allied professional, and we do not receive any compensation in the form of a finder's fee, referral fee, or commission for referring you to someone.

### Unaffiliated Money Managers, Custodians, and Investment Programs

As noted in Item 4, CLEAR VIEW may recommend that all or a portion of a Client's investment portfolio be implemented using the investment offerings of one or more Unaffiliated Manager[s]. In such instances, CLEAR VIEW performs initial and ongoing due diligence over the Unaffiliated Managers and their investment strategies. CLEAR VIEW and the Client enter into separate or combined agreements with each Unaffiliated Manager, depending on the requirements of their offering and agreements.

CLEAR VIEW has established relationships with several Unaffiliated Managers which may change over time, including Betterment Institutional. CLEAR VIEW does not receive any additional compensation from these Unaffiliated Managers. To access certain investment models, rebalancing services, and technology, we may enter into a co-advisory relationship with a third-party registered investment advisor such as Betterment, Altruist LLC, or TFIN Wealth which operates under multiple RIA firms and a broker-dealer. (CLEAR VIEW shall only receive its advisory fees as described in Item 5 above.)

To process securities business and record-keeping, we have independent, contractual agreements with unaffiliated third-party brokerage, custodian, and record-keeping services. These include Apex Clearing through Altruist, Pershing Advisor Solutions, LLC, a division of BNY Mellon through Shareholders Service Group, Inc., Betterment, AssetMark, Interactive Brokers, and Goldman Sachs (f/k/a Folio Institutional a division of Foliofn Investments, Inc.), member of FINRA/SIPC. We are not employed by these service providers, and we do not receive any form of compensation from these firms. CLEAR VIEW and these firms are not under common control or otherwise related.

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

### **Code of Ethics**

We have adopted a Code of Ethics (“Code”) that is occasionally amended. This Code is provided to each member of our staff and is available to you upon written request. It is based on the code of ethics promulgated by the Certified Financial Board of Standards.

The Code provides guidance on how our staff is expected to conduct themselves.

We expect our staff to conduct themselves with honesty and integrity and in compliance with all rules, laws and regulations of the state and federal agencies that may regulate us.

Our Code contains provisions preventing misuse of Client account[s], transaction history and confidential information. Our Code includes the following:

- Fiduciary Standards
- Duty of Confidentiality
- Duty of Reporting and Investigating Suspected Wrongdoing
- Handling Gifts and Entertainment
- Outside Employment
- Insider Trading
- Personal Securities Transactions
- Required Reports and Certifications
- Sanctions
- Compliance Review
- Allowed Exceptions to the Code

### **Participation or Interest in Client Transactions**

Our employees and their relatives may also be clients of the Advisor and may buy or sell securities that we may also recommend to you, including mutual funds and other widely held publicly traded securities.

We generally do not favor one client over another when making recommendations. We may take investment action for you or any other client contemporaneously subject to suitability and client objectives of each client account.

As noted in our Code of Ethics, we will handle purchases and sales in your account first before trading for a staff member unless it is related to mutual funds, ETFs, and certain widely held securities where the trading will be incidental relative to the total outstanding value of the security and have a negligible impact on market price.

For other thinly traded securities, you and your account will be provided with an opportunity to establish or decline taking a position at least one trading day before one of our employees may buy or sell that same security.

We do not act as a principal or agent in any investment that we may recommend to you. We do not lend to or borrow money from clients and will not participate as a co-investor with you as a client. We do not share in the gains or losses of your account.

As noted in our Code of Ethics, we enforce written policies reasonably designed to prevent the misuse of material non-public information by us, our employees or other persons related or affiliated with us or our staff.

We also use our best efforts to make sure that our employees do not use information about transactions in your account to profit at your expense by making trades in their own or other accounts that could affect the value of holdings in yours.

All staff members are required to report personal securities holdings and transactions to our Chief Compliance Officer for review on a regular basis.



## Item 12 Brokerage Practices

### **Investment or Brokerage Practices:**

Our general policy regarding the execution of Client securities brokerage transactions is to utilize the trading authority you have granted us to issue instructions to your account's broker to buy, sell or trade any security in the account. You will receive confirmations from the brokerage service after transactions are implemented.

Generally, we recommend the use of one or more appropriate Custodians that will serve as the broker-dealer for your investment management assets. As of December 31, 2022, CLEAR VIEW has custodian arrangements with Goldman Sachs/Folio Investments, Betterment, Pershing through Shareholders Service Group, and Apex Clearing through Altruist, AssetMark, and Interactive Brokers as noted in Item 10.

In other cases, you may choose to keep your investment assets with another Custodian or funds may be held with a qualified plan administrator. On such accounts that are "held away" from one of our brokerage service providers, we may not be able to issue instructions unless you have granted us permission that is accepted at the brokerage service. In these cases, our ability to implement trading actions may be blocked or limited and you may need to convey trading instructions if you choose. On accounts that clear through one of our brokerage service providers, we will arrange for trades to be executed.

The service providers we may use are reasonably expected to provide "best execution" of transactions. "Best execution" may not always mean the lowest trading cost. The decision to use a particular Custodian as broker-dealer is made in good faith and based on several qualitative factors. In addition to providing services at competitive rates, we also consider the quality of execution, speed of execution, responsiveness, ability to execute, the value of any research services, or value-added programs provided and Client services.

#### Soft Dollar Benefits

By working with a particular Custodian, Investment Platform or Broker-Dealer, we may receive certain benefits typically in the form of discounts for professional Errors and Omissions insurance or certain subscription research services, tools, and software for use in the practice. Such benefits are not limited or assigned to any particular client but used to benefit all clients using our services. We are not required to submit any fixed amount of business to these custodians or broker-dealers in exchange for these benefits.

## Item 13      Review of Accounts

### **Reviews for Accounts**

#### Financial Plans

We will review your financial plan depending on the schedule noted within the applicable service agreement. Generally, comprehensive and modular plans are reviewed at least once within the first year of engagement. Reviews in subsequent years as part of a periodic update service may incur a fee as noted in the Fee Schedule.

Reviews may be done more frequently at your request or as needed when changes occur in the markets or your personal circumstances.

These reviews will be completed by a CERTIFIED FINANCIAL PLANNER™ professional on our staff.

#### Investment Accounts

Generally, you will receive from the qualified custodian each month or billing period a printed statement. You may also arrange for secure online access to your account information through the custodian to see your account information more frequently.

You may choose to receive portfolio analysis reports from us. These may be in written or electronic format. If you do, we will provide you with printed reports at least on an annual basis after the end of each calendar year. We will arrange a time to review your account information with you in person or by phone or remote meeting facilitated by virtual meeting technology at least annually or you can call to arrange a different schedule. Note that more frequent on-demand performance reporting may be available through the online access granted by the custodian.

Your discretionary investment accounts are monitored regularly by a Principal of the Advisor. Your account may be rebalanced if we determine that the account is outside the predetermined allocation targets for your account and risk profile, or because market conditions warrant a change. We may also make changes to the composition of investments or the use of third-party investment services based on our research from other resources we use to screen investments, managers and platforms.

Investors who participate on various custodian platforms will receive periodic reports that generally contain a list of assets, investment results, and statistical data related to the client's account performance. These reports may be made available by mail or electronic delivery. The information in these reports may vary from custodial statements based on account procedures, reporting dates, or valuation methodologies used for certain securities.

## Item 14 Client Referrals and Other Compensation

We welcome referrals from satisfied Clients and allied professionals.

We also subscribe to various online referral-matching services where consumers may find a listing of our services or profile of the company and its Principal. Some of these services are offered through subscription services or professional trade groups or providers of the various designations held by the firm's Principal. These include Paladin Registry, the Financial Planning Association, the National Association of Personal Financial Advisors, NAEPC, NATP, AICCF and the CFP Board of Standards, Inc.

We may work with Solicitors at some point but not at this time. If you are referred to us by a Solicitor, we will disclose this to you and inform you if there is an impact on the cost of managing your account. Solicitors will be paid by us from a portion of our investment management or financial planning fee.

Any firm or person performing formal business development services for us in this capacity must comply with the requirements of the applicable securities regulators. The Advisor will comply with all rules and regulations that apply to any Solicitors we may work with including registration and disclosure requirements, as applicable.

Solicitors may not make investment recommendations to Clients on our behalf. Any solicitor will also be required to deliver our current Disclosure Brochure and Solicitor Disclosure Statement that each prospective client will acknowledge. The Disclosure Statement will contain the following information:

- The identity of the firm or person involved in the referral
- Any applicable relationship between us and the Solicitor
- Compensation to be received by the referring person or entity
- The amounts to be charged or incurred by the client over and above our Investment Management Fee, if applicable.

In addition to providing advice directly to consumers, we may also provide advice to employees for firms through a negotiated arrangement with the employer where the employer agrees to pay or subsidize the fees for its employees. Under these arrangements, we may charge a negotiated fixed fee per an agreement with the employer.

### Other Compensation – Arrangements with Other Registered Investments Advisors

#### Unaffiliated Money Managers and Investment Programs

As noted in Item 4, the Advisor may recommend that the use of one or more Unaffiliated Manager[s] to achieve the investment goals of the Client. CLEAR VIEW does not receive any additional forms of compensation under these arrangements. However, as noted in Item 5, CLEAR VIEW's fee may be calculated and deducted from the Client's assets by the Unaffiliated Manager[s] along with the fees charged by the Unaffiliated Manager[s].

(Please see discussions above under Items 4, 5 and 10).

Some platforms may offer us discounts, reimbursements, or services based on our use of the unaffiliated money manager's platform or program. Or we may receive discounts on certain services such as our professional liability insurance or subscriptions to certain software packages used with our clients. (See discussion under "Soft Dollar Benefits" in Item 12 above).

## **Item 15 Custody**

We do not take physical custody of your assets, securities or property.

While we do not take custody of your funds or securities, we may be deemed to have custody in the limited sense when we deduct our advisory fees from investment accounts we may manage for you. In this arrangement, you may authorize the Custodian in writing (usually in the account opening paperwork on file) to remit to us our fees from your account[s] for financial planning, investment management or account maintenance when you receive an invoice.

The Custodian will send to you statements at least quarterly and usually monthly that will show the total amount of your funds as well as your security positions and transactions during the period. These statements will also show amounts disbursed including fees paid to us. CLEAR VIEW or its delegate, the Custodian, will provide you with a statement that shows the fee calculated at the time it is deducted. You are encouraged to check the accuracy of these statements with the invoices that are sent by us and the Custodian on our behalf since the Custodian will not determine if our fee is calculated correctly.

## **Item 16 Investment Discretion**

When you hire us to provide investment advisory services, you may choose to grant us the authority to trade any investment security or cash as we may determine is appropriate without the need to inform or consult with you ahead of time.

This authority is called “investment discretion.” You may decide to limit or change this authority by letting us know in writing.

With investment discretion we have the flexibility to implement an investment program for you and make changes that we feel may be needed to rebalance or take advantage of market opportunities or trends. It also allows us to implement any defensive portfolio actions that may be needed as well.

We will use this authority to implement an investment program that meets the criteria of the investment policy statement (IPS) that you have provided to us and is consistent with your stated objectives, risk tolerance, risk capacity and time frame. We will also consider any limitations or restrictions that you have provided to us in writing.

Alternatively, you may choose to limit our trading authority. In such a “non-discretionary” investment management program, we will only execute changes, purchases, or sales after receiving your explicit permission for each and any action. We are not responsible for any losses, which may occur because of a communication delay by you, us, or the Custodian.

In some cases, you may engage us to provide periodic advice on assets held in your brokerage account held with a custodian of your choosing. In these cases, you may engage us to provide portfolio advice, research, analysis or recommendations that we will communicate to you for action implemented by you and your broker at your discretion.

## **Item 17 Voting Client Securities**

### **Proxy Voting Policy**

We do not vote proxies for securities that you may hold in your accounts. You are responsible for voting on proxies that you may receive from issuers of various securities owned by you or held in your accounts.

You may receive proxy solicitations from stock or bond issuers or mutual fund firms because of pending mergers, acquisitions, tender offers, or bankruptcy proceedings for example.

We will instruct the custodian of your account to forward to you copies of all appropriate proxies and shareholder communications related to your holdings.

## **Item 18 Financial Information**

As a registered investment adviser, we are required to provide you with certain financial information or disclosures about our financial condition. Clear View Wealth Advisors, LLC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to Clients and has not been the subject of a bankruptcy proceeding.

All our company books and records are kept in good order and may be inspected by any regulatory authority.

We maintain an appropriate bond amount as required by Massachusetts statutes and regulations.

## **Item 19 Requirements for State-Registered Advisers**

### **A. Educational Background and Business Experience of Principal Officer**

The General Manager and Managing Member of CLEAR VIEW is Steven J. Stanganelli. Information regarding the formal education and background of Mr. Stanganelli is included in Item 2 of Part 2B below.

### **B. Other Business Activities of Principal Officer**

The Advisor operates an income tax preparation service (doing business as Boston Tax Planners). We believe that this service will require about 10% to 20% of our staff time during the year. Services are offered on a fee basis, and you are not required to use these services to use our financial planning or investment services.

Mr. Stanganelli holds a real estate sales license, which is inactive. Mr. Stanganelli at one time held an insurance producer license, which has expired. These licenses are inactive. No referral fees, trails, or residual compensation is received by either the Advisor or its principal, Mr. Stanganelli.

Mr. Stanganelli was elected to a two-year term to the Amesbury City Council as an at-large representative in November 2015 and was reelected in November 2017, November 2019, and November 2021. It is estimated that the position will require approximately 5% of his time between Council and committee meetings throughout the year.

### **C. Performance Fee Calculations**

CLEAR VIEW does not charge performance-based fees for its investment advisory services. The fees charged by CLEAR VIEW are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

### **D. Disciplinary Information**

***There are no legal, civil, or disciplinary events to disclose regarding CLEAR VIEW or Mr. Stanganelli.***

CLEAR VIEW has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against CLEAR VIEW or Mr. Stanganelli.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding CLEAR VIEW or Mr. Stanganelli.***

### **E. Material Relationships with Issuers of Securities**

Neither CLEAR VIEW nor Mr. Stanganelli has any relationships or arrangements with issuers of securities.

On May 4, 2020, the firm received a Paycheck Protection Plan (PPP) Loan through the SBA in conjunction with the relief afforded by the CARES Act. On June 8, 2021, this loan was fully forgiven by the SBA. The firm used the PPP loan proceeds to continue payroll for the firm for advisory personnel and cover certain qualifying expenses including rent and utilities for its service locations. The firm did not suffer any interruption of service to clients.

Item 1 Cover Page

## **BROCHURE SUPPLEMENT**

This Form ADV2B (“Brochure Supplement”) provides information about STEVEN J. STANGANELLI, CFP® that supplements the CLEAR VIEW WEALTH ADVISORS, LLC Disclosure Brochure (Form ADV Part 2A), in which this Brochure Supplement is attached. Please contact the Advisor’s General Manager if you did not receive the CLEAR VIEW Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Clear View Wealth Advisors, LLC  
A Registered Investment Advisor

Principal Office:  
12 Amidon Avenue, Amesbury, MA 01913

Meeting Locations:  
100 Main Street, Amesbury, MA 01913  
25 Lowell Street, Suite 105, Wilmington, MA 01887  
Newburyport Development Corporation, 10 State Street, Newburyport, MA  
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PREPARED: February 1, 2023

This Brochure Supplement provides information about the qualifications and business experience of STEVEN J. STANGANELLI, CFP® of Clear View Wealth Advisors, LLC (“CLEAR VIEW” of the “Advisor”).

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

Additional information about STEVEN J. STANGANELLI also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational Background and Business Experience

STEVEN J. STANGANELLI, CFP®, CRPC®, AEP®, CCFS®, CCFC®  
General Manager, Managing Member  
Clear View Wealth Advisors, LLC

Born 1964

### Post-Secondary Education Background:

2021, Association of Certified College Financial Consultants, Certified College Financial Consultant Designation Program

2017, Association of Certified College Funding Specialists, Certified College Funding Specialist Designation Program

2009, Institute for Divorce Financial Analysts, Divorce Financial Analyst Certification Program

2008, Tallahassee Community College, CFP® Education Program

2007, The College for Financial Planning, CHARTERED RETIREMENT PLANNING COUNSELOR<sup>SM</sup> Program

2003, Boston University – Boston Institute for Finance, CFP® Education Program

1991, Bentley University (fka Bentley College), MS, Finance (concentration in Financial Planning), High Honors

1986, University of Massachusetts – Lowell (fka University of Lowell), BA, Economics & Political Science, Magna Cum Laude

### Recent Business Background:

2010 – Present, CLEAR VIEW WEALTH ADVISORS, LLC, (also DBA Boston Tax Planners, College Cash Pro, and Divorce Finance Pros) Amesbury, MA: General Manager, Managing Member, Chief Compliance Officer, Portfolio Strategist, Investment Adviser Representative, and Financial Planner

2009 – 2010, QUEST FINANCIAL SERVICES, Inc., Lynnfield, MA:  
Financial Planner, Investment Adviser Representative and Member of Investment Committee

2008 – 2009, FOCUS CAPITAL WEALTH MANAGEMENT, INC., Bedford, NH:  
Financial Planner and Investment Adviser Representative

2005 – 2008, MERRILL LYNCH PIERCE FENNER & SMITH - GLOBAL PRIVATE CLIENT GROUP, Andover, MA:  
Registered Representative and Investment Adviser Representative

2001 – 2005, INVESTORS CAPITAL CORPORATION & EASTERN POINT ADVISORS, Lynnfield, MA:  
Financial Advisor, Registered Representative and Investment Adviser Representative

1999 – 2001, H.D. VEST INVESTMENT SECURITIES, INC., Irving, TX:  
Financial Advisor, Registered Representative and Investment Adviser Representative



## Professional Designation: CERTIFIED FINANCIAL PLANNER™ Professional (“CFP®”)

### CFP® Certification Explanation Statement

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. As of 2023, more than 93,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

More information available at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements> and <https://www.finra.org/investors/professional-designations/cfp>

### **Professional Designation: CHARTERED RETIREMENT PLANNING COUNSELOR<sup>SM</sup> (“CRPC<sup>®</sup>”)**

Individuals who hold the CRPC<sup>®</sup> designation have completed a course of study through the College for Financial Planning encompassing pre- and postretirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

More information available at: <https://www.kaplanfinancial.com/wealth-management/crpc> and <https://www.finra.org/investors/professional-designations/crpc>

### **Professional Designation: ACCREDITED ESTATE PLANNER<sup>®</sup> (AEP<sup>®</sup>)**

The Accredited Estate Planner<sup>®</sup> (AEP<sup>®</sup>) designation is a graduate level specialization in estate planning, obtained in addition to already recognized professional credentials within the various disciplines of estate planning. It is awarded by the National Association of Estate Planners & Councils (NAEPC) to recognize estate planning professionals who meet stringent requirements of experience, knowledge, education, professional reputation, and character.

An ACCREDITED ESTATE PLANNER<sup>®</sup> may be nominated by a local NAEPC council. Applicants must meet all of the following requirements as established by the National Association of Estate Planners & Councils:

- Credentials: Current holder of one of several professional designations including the CFP<sup>®</sup> designation
- Experience: Presently engaged in ‘estate planning activities’ with at least fifteen (15) years of estate planning experience
- Continuing Education: Evidence of at least fifteen (15) hours of continuing education in estate planning in every two-year cycle.

More information available at: <http://www.naepc.org/designations/estate-planners> and <https://www.finra.org/investors/professional-designations/aep>

### **Professional Designation: CERTIFIED COLLEGE FUNDING SPECIALIST® (“CCFS®”)**

The CCFS® Designation is a specialization in college funding obtained in addition to other professional credentials. It is awarded by the [Association of Certified College Funding Specialists](#) and is recognized by [FINRA](#) and the Certified Financial Planner Board of Standards allowing continuing education credits for passing the course.

Candidates must meet at least one of the following requirements:

- Hold a professional financial certification or designation;
- Hold a current financial license in securities, insurance, or accounting, of
- Demonstrate a combination of education and experience deemed satisfactory by the ACCFS

In addition to the prerequisites noted, designees must satisfactorily complete a sixteen-hour self-study program and complete a test after each module. In each two-year cycle, twenty-four hours of continuing education must be completed from a list of courses approved by ACCFS.

More information available at: <https://www.accfs.com/about-us/about#overview> and <https://www.finra.org/investors/professional-designations/ccfs>

### **Professional Designation: CERTIFIED COLLEGE FINANCIAL CONSULTANT® (“CCFC®”)**

This designation is issued by the [American Institute of Certified College Financial Consultants \(AICCCFC\)](#) and is granted to individuals who meet all of the following prerequisites: Designees must possess either the CPA, PFS, CFP®, ChFC, CFA, CLU, EA, CDFA, AFC, or FPQP designation, a Master of Science or Master of Laws in Taxation, or the Series 65 License. Designees must complete a comprehensive education program that covers education funding, financial aid planning, student loan advising, and practical planning strategy topics, and receive a passing grade of 70 or higher on all respective assessments in the program. To maintain the CCFC designation, designees must complete four hours of continuing professional education each year. In addition, CCFC designation holders must abide by the Code of Ethics, which requires designees to act with integrity, objectivity, competence, fairness, professionalism, diligence, and maintain client confidentiality.

More information available at: <https://www.aicccfc.org/> and <https://www.finra.org/investors/professional-designations/ccfc>

### **Item 3 Disciplinary Information**

There are no civil or disciplinary events to disclose regarding Mr. Stanganelli. Mr. Stanganelli has never been involved in any regulatory or civil action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Stanganelli.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

However, we do encourage you to independently view the background of Mr. Stanganelli on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 3217444.

### **Item 4 Other Business Activities**

Steve Stanganelli is the General Manager and Managing Member of Clear View Wealth Advisors, LLC and his primary business activity is acting as a financial advisor or investment manager for clients like you. Services may be offered under separately branded service marks including CollegeCashPro.com, BostonTaxPlanners.com, DivorceFinancePros.com, and TaxWealthNetwork.com.

Steve Stanganelli also facilitates financial literacy workshops for organizations or employers through an independent contractor arrangement with various speaker bureaus offering financial wellness and education in the community.

In addition to his financial planning activities, Steve is also a tax preparer who works and directs activities at Boston Tax Planners, a unit of Clear View Wealth Advisors, LLC that was acquired on January 20, 2011 under the trade name XtraRefunds.

Steve Stanganelli does not actively engage in business as a:

- Registered representative of a broker-dealer
- Insurance broker or agent
- Bank or banker
- Real estate broker, dealer or agent
- Financial product salesperson

Since he does not sell insurance or securities products, he does not have any active licenses aside from that of an Investment Adviser Representative.

Steve Stanganelli holds a real estate sales license in Massachusetts, which is presently inactive. Steve Stanganelli is not affiliated with any other bank or other allied professional.

In November 2015 and again in November 2017, November 2019, and November 2021, Mr. Stanganelli was reelected to the Amesbury City Council as an at-large representative. As of January 3, 2022, he had been duly sworn into office for a fourth consecutive two-year term. As a member of the City Council, Mr. Stanganelli receives a stipend monthly as approved in the City's budget. It is estimated that the position will require approximately 5% of his time between council and committee meetings throughout the year.

**Item 5 Additional Compensation**

Steve Stanganelli has additional business activities that are detailed in Item 4 above.

**Item 6 Supervision**

The Chief Compliance Officer of CLEAR VIEW is Steve Stanganelli and is responsible for supervising all activities. The company engages the services of compliance consultants qualified in securities law and adviser compliance to advise and handle compliance and regulatory issues. Steve may be reached directly at 978-388-0020 or 617-398-7494.

**Item 7 Requirements for State-Registered Advisers**

Mr. Stanganelli does not have any additional information to disclose.

**Massachusetts Disclosure Requirement**

Steve Stanganelli has never been involved in any arbitration claims alleging damages nor has he been involved in any self-regulatory, organization or administrative proceeding involving any investment-related activity or business or theft or embezzlement or any such dishonest, unethical or unfair practices.