## FORM ADV PART 2A DISCLOSURE BROCHURE

## **Clearview Financial Strategies LLC**

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March 18, 2025

This brochure provides information about the qualifications and business practices of Clearview Financial Strategies LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at (864) 787-5115. 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 CLEARVIEW FINANCIAL STRATEGIES LLC (CRD #318184) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV

## **Item 2: Material Changes**

## **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

## **Material Changes since the Last Update**

This update is in accordance with the required annual update for Investment Advisors. Since the last filing on, March 27, 2024, no material changes have been made:

#### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

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

## Form ADV - Part 2A - Firm Brochure

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## **Item 4: Advisory Business**

### **Firm Description**

Clearview Financial Strategies LLC ("CFS") was founded in July of 2019 to offer insurance services and began offering advisory services in 2022. Jonathan Rogers is 100% owner.

## **Types of Advisory Services**

#### **ASSET MANAGEMENT**

CFS offers discretionary asset management services to advisory Clients. CFS will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize CFS discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

#### **ASSETS HELD AWAY**

CFS offers advice to individuals on their qualified plans. CFS will work with individuals on determining their individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, and asset allocation are based on the above factors. The accounts will be monitored on a continual basis.

#### FINANCIAL PLANNING AND CONSULTING

Financial planning services include a comprehensive evaluation of an investor's current and future financial state and will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. CFS will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals**: Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement**: A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis**: An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy**: A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- Comprehensive risk management plan: Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan**: Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.

- **Tax reduction strategy**: Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.
- **Estate preservation**: Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.

If a conflict of interest exists between the interests of CFS and the interests of the Client, the Client is under no obligation to act upon CFS's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through CFS. Financial plans will be completed and delivered inside of 30 days contingent upon timely delivery of all required documentation.

## **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

## **Wrap Fee Programs**

CFS does not sponsor any wrap fee programs.

### **Client Assets under Management**

As of December 31, 2024, CFS has \$24,000,000 in discretionary Client assets under management and \$0 non-discretionary assets under management.

## **Item 5: Fees and Compensation**

## Method of Compensation and Fee Schedule

#### ASSET MANAGEMENT

CFS offers discretionary direct asset management services to advisory Clients. CFS charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Monthly Fee
Up to \$500,000	1.25%	.104%
\$500,0001 to \$2,000,000	1.00%	.083%
Over \$2,000,001	0.85%	.071%

This is a breakpoint fee schedule; the entire portfolio is charged the same asset management fee. For example, a Client with \$750,000 under management would pay 7,500 on an annual basis.  $750,000 \times 1.00\% = 7,500$ .

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). CFS considers cash to be an asset class, and as such is included in fee calculations. Also, to be noted, at times fees will exceed the money market yield. Fees are billed monthly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous month. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without

penalty. After the initial five (5) business days, the agreement may be terminated by CFS with thirty (30) days written notice to Client and by the Client at any time with written notice to CFS. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to CFS. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

#### ASSETS HELD AWAY

Fees for Assets Held Away will be charged according to the fee schedule above and deducted from a non-qualified account managed by CFS.

#### FINANCIAL PLANNING AND CONSULTING

CFS charges an hourly fee based on complexity and unique Client needs for financial planning.

#### **HOURLY FEES**

Financial Planning Services are offered based on an hourly fee of \$300 per hour.

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery.

Prior to the planning process the Client will be provided an estimated plan fee. Services are completed and delivered inside of 30 days contingent upon timely delivery of all required documentation.

Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to CFS. Refunds will be based on the number of hours spent creating the plan. For example, if a Client engages CFS to provide a financial plan and agrees upon an estimated fee of \$5,000. Client will pay an initial fee of \$2,500. If they decide not to proceed on Day 10. CFS will provide an invoice providing the details of the work completed. As stated, refunds will be based on the number of hours the firm has spent on the plan. If the firm has worked on the plan for five hours, then the firm would be owed \$1,500 (\$300/hr x 5), since the client already paid \$2,500 they would be due a refund of \$1,000. Refunds will automatically be sent via check.

CFS reserves the right to waive the fee should the Client implement the plan through CFS.

### **Client Payment of Fees**

Fees for asset management services and assets held away services are:

• deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed to the Client and paid directly to CFS.

#### Additional Client Fees Charged

Custodians may charge transaction fees other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. CFS does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to CFS. For more details on the brokerage practices, see Item 12 of this brochure.

### **Prepayment of Client Fees**

CFS does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to CFS.

### **External Compensation for the Sale of Securities to Clients**

Jonathan Rogers receives external compensation for the sale of insurance products to clients as an independent insurance agent. Approximately 5% of his time is spent in this practice and less than 15% of his total revenue is generated as an insurance agent. He will offer clients products from this activity.

This represents a conflict of interest because it gives an incentive to recommend products based on the commission received rather than the client's needs. As an insurance agent, Jonathan Rogers does not charge advisory fees for the services offered through Clearview Financial Strategies LLC. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. To mitigate this conflict of interest our firm will always act in the client's best interest and advise the client that they are under no obligation to place assets to an account managed by our firm. Clients have the option to purchase investment products that CFS recommends through other insurance agents that are not affiliated with CFS.

As part of our fiduciary duty to our clients, our firm will endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons creates a potential conflict of interest and may indirectly influence our firm's choice of Clearview Financial Strategies LLC as an insurance recommendation. Our firm examined this potential conflict of interest when our firm chose to recommend Clearview Financial Strategies LLC and have determined that the recommendation is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

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

## **Sharing of Capital Gains**

Fees are <u>not</u> based on a share of the capital gains or capital appreciation of managed securities.

CFS does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for CFS to recommend an investment that may carry a higher degree of risk to the Client.

## **Item 7: Types of Clients**

## Description

CFS generally provides investment advice to individuals. Client relationships vary in scope and length of service.

#### **Account Minimums**

CFS requires a minimum of \$500,000 per household to open account(s). In certain instances, the minimum account size may be lowered or waived.

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

### **Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

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 take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in 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.

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 twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

## **Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to CFS. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

#### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with CFS:

 Market Risk: The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors

- should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk*: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk*: When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk*: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Management Risk: The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- Equity Risk: Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and midcap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- Fixed Income Risk: The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- Investment Companies Risk: When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net

asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

- Long-term purchases: Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- Short-term purchases: Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk the risk that your investment's return will not keep up with inflation.
- *Trading risk*: Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

## **Item 9: Disciplinary Information**

#### **Criminal or Civil Actions**

CFS and its management have not been involved in any criminal or civil action.

#### **Administrative Enforcement Proceedings**

CFS and its management have not been involved in administrative enforcement proceedings.

### **Self- Regulatory Organization Enforcement Proceedings**

CFS and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of CFS or the integrity of its management.

Pursuant to Mass. Code Regs. 12.205(8)(d), Client can obtain the disciplinary history of CFS or its representatives upon request of the Massachusetts Securities Division they can be reached at One Ashburton Place, Room 1701, Boston, Massachusetts 02108  $\cdot$  (617) 727-3548 www.state.ma.us/sec/sct

## Item 10: Other Financial Industry Activities and Affiliations

## **Broker-Dealer or Representative Registration**

CFS is not registered as a broker-dealer and no affiliated representatives of CFS are registered representatives of a broker-dealer.

#### **Futures or Commodity Registration**

Neither CFS nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

#### Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Jonathan Rogers has a financial industry affiliated business as an independent licensed insurance agent. Approximately 5% of his time is spent on this activity. He will offer Client's insurances services. As an insurance agent he will receive separate yet typical compensation.

Insurance services represent a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

As part of our fiduciary duty to our clients, our firm will endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons creates a potential conflict of interest and may indirectly influence our firm's choice of Clearview Financial Strategies LLC as an insurance recommendation. Our firm examined this potential conflict of interest when our firm chose to recommend Clearview Financial Strategies LLC and have determined that the recommendation is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

Jonathan Rogers is also the managing member of Horizon Properties LLC a company he owns for real estate properties. There is no conflict of interest as clients of CFS are not solicited for services of Horizon Properties LLC.

**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest** CFS does not select or recommend other investment advisors.

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

## **Code of Ethics Description**

Our firm and representatives must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This duty includes procedures for personal securities transaction and insider trading. Our firm requires all representatives to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. A summary of the Code of Ethics' Principles is outlined below.

- *Integrity* Associated persons shall offer and provide professional services with integrity.
- *Objectivity* Associated persons shall be objective in providing professional services to clients.
- *Competence* Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.

- *Confidentiality* Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- *Professionalism* Associated persons' conduct in all matter shall reflect credit of the profession.
- *Diligence* Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

CFS will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

## Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc. without prior disclosure to the client.

## Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

We recognize that the personal investment transactions of our representatives demand the application of a Code of Ethics with high standards and requires that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, our firm also believes that if investment goals are similar for clients and for our representatives, it is logical, and even desirable, that there be common ownership of some securities.

In order to prevent conflicts of interest, our firm has established procedures for transactions effected by our representatives for their personal accounts<sup>1</sup>. In order to monitor compliance with our personal trading policy, our firm has pre-clearance requirements and a quarterly securities transaction reporting system for all of our representatives.

Related persons of our firm may buy or sell securities similar to those we recommend to clients for their accounts. Our policy is designed to assure that the personal securities transactions, activities and interests of the employees of our firm will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the

<sup>&</sup>lt;sup>1</sup> For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

transaction in an account, and we maintain the required personal securities transaction records per regulation.

## Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

CFS does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide CFS with copies of their brokerage statements.

The Chief Compliance Officer of CFS is Jonathan Rogers. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

## Trading Securities At/Around the Same Time as Client's Securities

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Related persons will not trade non-mutual fund securities prior to the same security for clients on the same day.

## **Item 12: Brokerage Practices**

### Factors Used to Select Broker-Dealers for Client Transactions

CFS will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. CFS will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. CFS relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by CFS. CFS does not receive any portion of the trading fees.

CFS will recommend the use of Charles Schwab.

• Research and Other Soft Dollar Benefits

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by CFS from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although CFS has no formal soft dollar arrangements, CFS may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or "soft dollar"

benefits". As permitted by Section 28(e) of the Securities Exchange Act of 1934, CFS receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of CFS. CFS cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. CFS does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when CFS receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that CFS has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- Brokerage for Client Referrals

  CFS does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.
- Directed Brokerage
   Clients who direct brokerage outside our recommendation may be unable to achieve
   the most favorable execution of client transactions as client directed brokerage may
   cost clients more money. For example, in a directed brokerage account, you may pay
   higher brokerage commissions because we may not be able to aggregate orders to
   reduce transaction costs, or you may receive less favorable prices.

#### Retirement Rollovers-Potential for Conflict of Interest

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options):

- 1. leave the money in the former employer's plan, if permitted,
- 2. roll over the assets to the new employer's plan, if one is available and rollovers are permitted.
- 3. roll over to an Individual Retirement Account ("IRA"), or
- 4. cash out the account value (which could, depending upon the client's age, result in adverse tax consequences).

If we recommend that a client roll over their retirement plan assets into an account to be managed by our firm, such a recommendation creates a conflict of interest if we will earn an advisory fee on the rolled over assets. To mitigate this conflict of interest our firm will always act in the client's best interest and advise the client that they are under no obligation to roll over retirement plan assets to an account managed by our firm. Our Chief Compliance Officer remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

## **Aggregating Securities Transactions for Client Accounts**

CFS is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of CFS. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation if not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-lot trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

### **Item 13: Review of Accounts**

## Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of CFS, Jonathan Rogers. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, CFS suggests updating at least annually.

## **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

## **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than monthly for managed accounts. Account statements are issued by CFS's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs. CFS does not provide additional reports to Clients.

## **Item 14: Client Referrals and Other Compensation**

## **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

CFS does not receive any economic benefits from external sources.

#### **Advisory Firm Payments for Client Referrals**

CFS does not compensate for Client referrals.

## **Item 15: Custody**

## **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by CFS.

CFS is deemed to have custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of CFS.

If CFS is authorized or permitted to deduct fees directly from the account by the custodian:

- CFS will provide the Client with an invoice concurrent to instructing the custodian
  to deduct the fee stating the amount of the fee, the formula used to calculate the fee,
  the amount of assets under management the fee is based on and the time period
  covered by the fee;
- CFS will obtain written authorization signed by the Client allowing the fees to be deducted; and

 The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

## **Item 16: Investment Discretion**

## **Discretionary Authority for Trading**

CFS requires discretionary authority to manage securities accounts on behalf of Clients. CFS has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

CFS allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to CFS in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. CFS does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

## **Item 17: Voting Client Securities**

## **Proxy Votes**

CFS does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, CFS will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

## **Item 18: Financial Information**

#### **Balance Sheet**

A balance sheet is not required to be provided to Clients because CFS does not serve as a custodian for Client funds or securities and CFS does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

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

CFS has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

#### **Bankruptcy Petitions during the Past Ten Years**

CFS has not had any bankruptcy petitions in the last ten years.

## **Item 19: Requirements for State Registered Advisors**

## **Principal Executive Officers and Management Persons**

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

#### **Outside Business Activities**

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

### **Performance Based Fee Description**

Neither CFS nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

## Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither CFS nor its management have been involved in any of the following:

- 1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - 1. An investment or an investment-related business or activity;
  - 2. Fraud, false statement(s) or omissions;
  - 3. Theft, embezzlement or other wrongful taking of property;
  - 4. Bribery, forgery, counterfeiting, or extortion;
  - 5. Dishonest, unfair or unethical practices.
- 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - 1. An investment or an investment-related business or activity;
  - 2. Fraud, false statement(s) or omissions;
  - 3. Theft, embezzlement or other wrongful taking of property;
  - 4. Bribery, forgery, counterfeiting, or extortion;
  - 5. Dishonest, unfair or unethical practices.

## Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Item 1 Cover Page

## **SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

## Jonathan Rogers

## **Clearview Financial Strategies LLC**

## **Office Address:**

135 Maple Avenue Atkinson, NH 03811

Tel: (864) 787-5115

Email: Jr@clearviewfinancialstrategies.com

Website: CFSfinancialstrategies.com

March 18, 2025

This brochure supplement provides information about Jonathan Rogers and supplements the Clearview Financial Strategies LLC brochure. You should have received a copy of that brochure. Please contact Jonathan Rogers if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Jonathan Rogers (CRD #6381568) is available on the SEC's website at www.adviserinfo.sec.gov.

## **Brochure Supplement (Part 2B of Form ADV)**

## **Supervised Person Brochure**

## **Principal Executive Officer - Jonathan Rogers**

• Year of birth: 1993

## Item 2 - Educational Background and Business Experience

## **Educational Background:**

• Emmanuel College; Bachelor's in Finance and Economics; 2015

#### **Business Experience:**

- Clearview Financial Strategies LLC; Managing Member/Chief Compliance Officer/Investment Advisor Representative; 01/2022-Present
- Sole Proprietor, Insurance Agent; 01/2022-Present
- Horizon Properties LLC; Managing Member; 11/2020-Present
- Jonathan Rogers dba Clearview Financial Strategies; Insurance Agent; 09/2016-12/2021
- Gradient Advisors, LLC; Investment Advisor Representative; 11/2021-04/2022
- Inspire Advisors, LLC; Investment Advisor Representative; 08/2019-10/2021
- MML Investors Services, LLC; Registered Representative; 05/2015-09/2016
- Mass Mutual Life Insurance Company; Agent; 04/2015-09/2016
- New York Life/Eagle Strategies; Intern; 05/2014-04/2015
- Emmanuel College; Student; 08/2013-05/2015
- Express Employment Professionals; Laborer: 04/2005-08/2013

#### **Item 3 - Disciplinary Information**

- A. Jonathan Rogers has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
  - 1. Was convicted of, or pled guilty or nolo contender ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  - 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  - 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
  - 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Jonathan Rogers never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

- 1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
- 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
  - (a)denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Jonathan Rogers has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
  - 1. Was found to have caused an investment-related business to lose its authorization to do business; or
  - 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Jonathan Rogers has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

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

Jonathan Rogers has a financial industry affiliated business as an independent licensed insurance agent. Approximately 5% of his time is spent on this activity. He will offer Client's insurances services. As an insurance agent he will receive separate yet typical compensation.

Insurance services represent a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Jonathan Rogers is also the managing member of Horizon Properties LLC a company he owns for real estate properties. There is no conflict of interest as clients of CFS are not solicited for services of Horizon Properties LLC.

#### **Item 5 - Additional Compensation**

Jonathan Rogers receives commissions on the insurance products he sells. He does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is described in Item 5 of Part 2A.

#### **Item 6 - Supervision**

Since Jonathan Rogers is the sole owner and investment adviser representative of CFS and is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at Jr@clearviewfinancialstrategies.com or (864) 787-5115.

### Item 7 - Requirements for State-Registered Advisors

- A. Jonathan Rogers has not been involved in any of the following:
  - 1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
    - a) An investment or an investment-related business or activity;
    - b) Fraud, false statement(s) or omissions;
    - c) Theft, embezzlement or other wrongful taking of property;
    - d) Bribery, forgery, counterfeiting, or extortion;
    - e) Dishonest, unfair or unethical practices.
  - 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) An investment or an investment-related business or activity;
    - b) Fraud, false statement(s) or omissions;
    - c) Theft, embezzlement or other wrongful taking of property;
    - d) Bribery, forgery, counterfeiting, or extortion;
    - e) Dishonest, unfair or unethical practices.
- B. Jonathan Rogers has never been the subject of a bankruptcy petition.