

# Item 1: Cover Page



ClearView Investments, LLC

1360 Baldwin St.  
Jenison, MI 49428

**Form ADV Part 2A – Firm Brochure**

616-667-8990

Dated: March 08, 2023

[www.clearviewinvesting.com](http://www.clearviewinvesting.com)

This Brochure provides information about the qualifications and business practices of ClearView Investments, LLC, “CVI”. If you have any questions about the contents of this Brochure, please contact us at 616-667-8990. 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.

ClearView Investments, LLC is registered as an Investment Adviser with the State of Michigan. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about CVI is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number 143693.

## Item 2: Material Changes

Since our previous annual amendment filed on 03/21/2022 no material changes have been made since our previous filing of this brochure.

### 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 in the business practices of ClearView Investments, LLC.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 143693.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at 616-667-8990.

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# Item 4: Advisory Business

## Description of Advisory Firm

ClearView Investments, LLC is registered as an Investment Adviser with the State of Michigan. We were founded in July 09, 2007, and the principle owners are Timothy John DeVries and Karl Gerald Holzhueter.

Assets Under Management: Discretionary \$27,720,355 and Non-Discretionary \$11,264,695. Assets Under Management were calculated as of December 31, 2022.

## Types of Advisory Services

### Investment Advisory Services

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

### Use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs)

We offer the use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs) for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

**Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

**Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected

broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

**Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

### **Wrap Fee Programs**

We do not participate in wrap fee programs.

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

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

### **Investment Advisory Services**

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

<b>Account Value</b>	<b>Annual Advisory Fee</b>
<b>\$0 - \$499,999</b>	1.0 %
<b>\$500,000 - \$749,999</b>	0.85%
<b>\$750,000 - \$1,000,000</b>	0.70%
<b>\$1,000,000 and Above</b>	0.50%

The annual fees are negotiable and are pro-rated and paid in arrears on a quarterly basis. The advisory fee is a tiered fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from client accounts, or the client may choose to pay by check. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

When an outside manager is used, the annual fees are negotiable and are pro-rated and paid in advance or arrears, depending on the chosen outside manager's policy, on a quarterly basis. The Outside Manager will debit the client's account for both the Outside Manager's fee, and CVI's advisory fee, and will remit CVI's fee to CVI. Please note, the above fee schedule does not include the Outside Manager's fee. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

### **Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

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

We provide financial planning and portfolio management services to individuals, high net-worth individuals, banking or thrift institutions, investment companies, business development companies, pool investment vehicles, pension and profit sharing plans, charitable organizations, corporations or other businesses, state or municipal government entities, other investment advisers, insurance companies.

We do not have a minimum account size requirement.

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

Our primary methods of investment analysis are fundamental and technical.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Use of Outside Managers:** We refer clients to third-party investment advisers ("outside managers"). Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

## **Passive Investment Management**

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

## **Material Risks Involved**

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.



**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. 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; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) 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. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

**Investment Companies Risk.** When a client invests in open-end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of 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).

## Item 9: Disciplinary Information

### **Criminal or Civil Actions**

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

### **Administrative Enforcement Proceedings**

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

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

CVI 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 CVI or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

No CVI employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No CVI employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

CVI does not have any related parties. As a result, we do not have a relationship with any related parties.

CVI only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

### **Recommendations or Selections of Other Investment Advisers**

As referenced in Item 4 of this brochure, CVI recommends clients to Outside Managers to manage their accounts. In the event that we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, CVI will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. Although CVI adheres to the CFP® Board of Standards Inc., no one at CVI holds the CFP® designation.

## Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. 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 the 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 a copy of its Code of Ethics to any client or prospective client upon request.

## Investment Recommendations Involving a Material Financial Interest and Conflicts 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.

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

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. 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 transaction in an account, and we maintain the required personal securities transaction records per regulation.

### **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. We will not trade non-mutual fund securities 5 days prior to the same security for clients.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Custodians and/or Broker-Dealers**

ClearView Investments, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

#### **1. Research and Other Soft-Dollar Benefits**

We currently do not receive soft dollar benefits

#### **2. Brokerage for Client Referrals**

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

#### **3. Clients Directing Which Broker/Dealer/Custodian to Use**

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients money over using a lower-cost custodian.

### **The Custodian and Brokers We Use**

#### **Betterment**

CVI does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us the authority to withdraw advisory fees from your account (see Item

15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We may recommend that our clients use MTG, LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Betterment Securities. Betterment Securities will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we may recommend that you use Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Betterment Securities by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then we cannot manage your account on Betterment Institutional (defined below).

## **Your Brokerage and Custody Costs**

For our clients' accounts that Betterment Securities maintains, Betterment Securities generally does not charge you separately for custody services but is compensated as part of the Betterment Institutional (defined below) platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. We have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "Factors Used to Select Custodians and/or Broker-Dealers").

## **Services Available to Us via Betterment Institutional**

Betterment Securities serves as broker-dealer to Betterment Institutional, an investment and advice platform serving independent investment advisory firms like us ("Betterment Institutional"). Betterment Institutional also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Betterment Institutional's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment Institutional's support services:

**SERVICES THAT BENEFIT YOU.** Betterment Institutional includes access to a range of investment products, execution of securities transactions, and custody of client assets through Betterment Securities. Betterment Securities' services described in this paragraph generally benefit you and your account.

**SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment Institutional also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:

- Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts.

- Provide access to client account data (such as duplicate trade confirmations and account statements).

- Provide pricing and other market data.

- Assist with back-office functions, recordkeeping, and client reporting.

SERVICES THAT GENERALLY BENEFIT ONLY US. By using Betterment Institutional, we will be offered other services intended to help us manage and further develop our business enterprise. These services include:

Educational conferences and events.

Consulting on technology, compliance, legal, and business needs.

Publications and conferences on practice management and business succession.

## **Our Interest in Betterment Securities' Services**

The availability of these services from Betterment Institutional benefits us because we do not have to produce or purchase them. In addition, we don't have to pay for Betterment Securities' services. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment Institutional and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment Institutional and Betterment Securities' services that benefit only us.

## **Altruist**

CVI does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use Apex Clearing, a registered broker/dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Altruist (“Altruist”). Altruist will arrange for your assets to be held in a brokerage account and they will buy and sell securities when we and/or you instruct them to. While we recommend that you use Apex Clearing as custodian/broker, you will decide whether to do so and will open your account with Apex Clearing by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Apex Clearing, other custodians may be available to you through Altruist's Platform.

**HOW WE SELECT BROKERS/CUSTODIANS** We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including: Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services. Capability to facilitate timely transfers and payments to and from accounts. Availability of investment research and tools that assist us in making investment decisions. Quality of services. Competitiveness of the price of those services and willingness to negotiate the prices. Reputation, financial strength, and stability. Prior service to us and our other clients.

**YOUR BROKERAGE AND CUSTODY COSTS** for our clients' accounts that Altruist maintains, Apex Clearing generally does not charge you separately for custody services, but is compensated as part of the Altruist's platform fee, which is paid by ClearView Investments, LLC. We have determined that having

Altruist execute trades through Apex Clearing is consistent with our duty to seek “best execution” of your account. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

SERVICES AVAILABLE TO US VIA Altruist Apex Clearing serves as a broker/dealer to Altruist, an investment and advice Platform serving independent investment advisory firms like us. Altruist also makes available various support services which may not be available to other investment advisory firms. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Altruist’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Altruist’s support services:

1. **SERVICES THAT BENEFIT YOU.** Altruist includes access to a range of investment products, execution of securities transactions, and custody of client assets through Apex Clearing and other broker/dealer custodians. Services described in this paragraph generally benefit you and your account.
2. **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Altruist also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts, such as software and technology that may:
  - Assist with back- and middle-office functions, limited recordkeeping, and client reporting of our clients’ accounts
  - Provide access to client account data (such as duplicate trade confirmations and account statements)
  - Provide pricing and other market data.
3. **SERVICES THAT GENERALLY BENEFIT ONLY US.** By using Altruist, we will be offered other services intended to help us manage and further develop our business enterprise. These services include:
  - Educational conferences and events
  - Consulting on technology and business needs

## **Aggregating (Block) Trading for Multiple Client Accounts**

Outside Managers used by CVI may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as “block trading”). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

## Item 13: Review of Accounts

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Timothy DeVries, Karl Hozhueter, or Kurt Holzhueter. The account is reviewed with regards to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

CVI will not provide written reports to Investment Management clients.

## Item 14: Client Referrals and Other Compensation

Betterment- We receive a non-economic benefit from Betterment Institutional and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Betterment Institutional and Betterment Securities' products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Altruist's- We receive indirect economic benefits from Altruist in the form of the support products and services that they make available to us and other independent investment advisors. We may receive indirect economic benefits from service providers (such as custodians, broker/dealers) utilized by ALTRUIST. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Altruist's products and services is not based on us giving specific investment advice, such as buying specific securities for our clients.

## Item 15: Custody

CVI does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which CVI directly debits their advisory fee:

- i. CVI will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The client will provide written authorization to CVI, permitting them to be paid directly for their accounts held by the custodian.



Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

For those client accounts where we provide Investment Advisory Services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

## Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

# Item 19: Requirements for State-Registered Advisers

## **Principle Executive Officers and Management Persons; Their Formal Education and Business Background.**

CVI has currently has two management persons and executive officers; Timothy John DeVries and Karl Gerald Holzhueter. Their education and business background can be found on the Supplemental ADV Part 2B forms.

## **Other Business Activities**

Timothy John DeVries and Karl Gerald Holzhueter's other business activities can be found on Supplemental ADV Part 2B forms.

## **Performance-Based Fees**

CVI is not compensated by performance-based fees.

## **Material Disciplinary Disclosures**

No management person at ClearView Investments, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## **Material Relationships That Management Persons Have With Issuers of Securities**

Neither CVI, nor its managing members, have a relationship or arrangement with issuers of securities.

## **Additional Compensation**

Neither Timothy John DeVries nor Karl Gerald Holzhueter receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CVI.

## **Supervision**

Timothy John DeVries and Karl Gerald Holzhueter, as Managing Members of CVI, are responsible for supervision. They may be contacted at the phone number on this brochure supplement.

## **Requirements for State Registered Advisers**

No management person at CVI has been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



ClearView Investments, LLC

1360 Baldwin St  
Jenison, MI 49428  
616-667-8990

Dated 01/22/2021

Form ADV Part 2B – Brochure Supplement

*For*

**Timothy John DeVries CRD #4743562**

Managing Member, and Chief Compliance Officer

This brochure supplement provides information about Timothy DeVries that supplements the ClearView Investments, LLC (“CVI”) brochure. A copy of that brochure precedes this supplement. Please contact Timothy DeVries if the CVI brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Timothy DeVries is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number CRD # 4743562.

## Item 2: Educational Background and Business Experience

### **Timothy John DeVries**

Born: 1972

#### **Educational Background**

- 2012 – Masters of Management, Aquinas College
- 2010 – BS Criminal Justice, Ferris State University

#### **Business Experience**

- 2007 – Present, ClearView Investments, LLC, Managing Member and CCO
- 1996 – Present, Grand Rapids Police Department, Detective
- 2003 – 2016, HBW Insurance & Financial Services, Independent Insurance Agent
- 2006 – 2007, HBW Securities, LLC, Registered Representative
- 2006 – 2007, CPR Investments, LLC, Investment Advisor Representative
- 2004 – 2006, American General Securities, Registered Representative

## Item 3: Disciplinary Information

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

## Item 4: Other Business Activities

Timothy DeVries is an owner of CVI Properties, LLC. Timothy DeVries is a Detective with the Grand Rapids Police Department in Michigan.

## Item 5: Additional Compensation

Timothy DeVries does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CVI.

## Item 6: Supervision

As co-owner and representative of ClearView Investment, LLC, Timothy John DeVries works closely with co-owner Karl Holzhueter, to supervise all duties and activities of the firm. Timothy DeVries' contact information is on the cover of this disclosure document.

## Item 7: Requirements for State Registered Advisers

Timothy DeVries has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



ClearView Investments, LLC

1360 Baldwin St  
Jenison, MI 49428  
616-667-8990

Dated 01/22/2021

Form ADV Part 2B – Brochure Supplement

*For*

**Karl Gerald Holzhueter CRD #4743561**

Managing Member, Investment Advisor Representative

This brochure supplement provides information about Karl Holzhueter that supplements the ClearView Investments, LLC (“CVI”) brochure. A copy of that brochure precedes this supplement. Please contact Karl Holzhueter if the CVI brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Karl Holzhueter is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number CRD # 4743561.

## Item 2: Educational Background and Business Experience

### **Karl Gerald Holzhueter**

Born: 1966

#### **Educational Background**

- 1995 – BS Political Science, Grand Valley State University

#### **Business Experience**

- 2007 – Present, ClearView Investments, LLC, Managing Member and CCO
- 1992 – 2017, Grand Rapids Police Department, Police Officer
- 2003 – 2016, HBW Insurance & Financial Services, Independent Insurance Agent
- 2006 – 2007, HBW Securities, LLC, Registered Representative
- 2006 – 2007, CPR Investments, LLC, Investment Advisor Representative
- 2005 – 2005, American General Securities, Registered Representative

## Item 3: Disciplinary Information

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

## Item 4: Other Business Activities

Karl Holzhueter is an owner of CVI Properties, LLC.

## Item 5: Additional Compensation

Karl Holzhueter does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CVI.

## Item 6: Supervision

As co-owner and representative of ClearView Investment, LLC, Karl Holzhueter works closely with co-owner Timothy DeVries, to supervise all duties and activities of the firm. Karl Holzhueter's contact information is on the cover of this disclosure document.



ClearView Investments, LLC

1360 Baldwin St  
Jenison, MI 49428  
616-667-8990

Dated 01/22/2021

Form ADV Part 2B – Brochure Supplement

*For*

**Kurt Philip Holzhueter CRD #5571075**

Managing Member, Investment Advisor Representative

This brochure supplement provides information about Kurt Holzhueter that supplements the ClearView Investments, LLC (“CVI”) brochure. A copy of that brochure precedes this supplement. Please contact Kurt Holzhueter if the CVI brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Kurt Holzhueter is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number CRD # 5571075.



## Item 2: Educational Background and Business Experience

### **Kurt Philip Holzhueter**

Born: 1960

#### **Educational Background**

- 1991 – Masters of Education, Grand Valley State University
- 1982 – BA Psychology & Special Education, Grand Valley State University

#### **Business Experience**

- 2007 – Present, ClearView Investments, LLC, Investment Advisor Representative
- 1987 – Present, Thornapple Kellogg High School, Teacher
- 2007 – 2017, HBW Insurance & Financial Services, Independent Insurance Agent

## Item 3: Disciplinary Information

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

## Item 4: Other Business Activities

Kurt Holzhueter is not engaged in any investment-related business or occupation (other than this advisory firm).

## Item 5: Additional Compensation

Kurt Holzhueter does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CVI.

## Item 6: Supervision

As a representative of Clearview Investments, LLC, Kurt Holzhueter works closely with supervisor Karl G Holzhueter, and all advice provided to clients is reviewed by this supervisor prior to implementation. Karl Holzhueter can be reached at (616) 540-3326. Kurt Holzhueter adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

## Item 7: Requirements for State Registered Advisers

Kurt Holzhueter has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



ClearView Investments, LLC

1360 Baldwin St  
Jenison, MI 49428  
616-667-8990

Dated January 22, 2021

Form ADV Part 2B – Brochure Supplement

*For*

**Leonard David DeBraber CRD #4329156**

Managing Member, Investment Advisor Representative

This brochure supplement provides information about Leonard DeBraber that supplements the ClearView Investments, LLC (“CVI”) brochure. A copy of that brochure precedes this supplement. Please contact Leonard DeBraber if the CVI brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Leonard DeBraber is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number CRD # 4329156.

## Item 2: Educational Background and Business Experience

### **Leonard David DeBraber**

Born: 1947

#### **Educational Background**

- 1994 – Associates Degree General Business, Davenport University
- 1972 – Counseling & Personnel , Western Michigan University
- 1969 – BS SS Group Major, Grand Valley State University

#### **Business Experience**

- 2014 – Present, ClearView Investments, LLC, Investment Advisor Representative
- 1987 – Present, Thornapple Kellogg High School, Teacher
- 2005 – 2012, HBW Insurance & Financial Services, Provisional AVP

## Item 3: Disciplinary Information

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

## Item 4: Other Business Activities

Leonard DeBraber is not engaged in any investment-related business or occupation (other than this advisory firm).

## Item 5: Additional Compensation

Leonard DeBraber does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CVI.

## Item 6: Supervision

As a representative of Clearview Investments, LLC, Leonard DeBraber works closely with supervisor Karl G Holzhueter, and all advice provided to clients is reviewed by this supervisor prior to implementation. Karl Holzhueter can be reached at (616) 540-3326. Leonard DeBraber adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

## Item 7: Requirements for State Registered Advisers

Leonard DeBraber has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



ClearView Investments, LLC

1360 Baldwin St  
Jenison, MI 49428  
616-667-8990

Dated January 22, 2021

Form ADV Part 2B – Brochure Supplement

*For*

**Lori Kay Holzhueter CRD #5991486**

Managing Member, Investment Advisor Representative

This brochure supplement provides information about Lori Holzhueter that supplements the ClearView Investments, LLC (“CVI”) brochure. A copy of that brochure precedes this supplement. Please contact Lori Holzhueter if the CVI brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Lori Holzhueter is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number CRD # 5991486



## Item 2: Educational Background and Business Experience

### **Lori Kay Holzhueter**

Born: 1967

#### **Educational Background**

- 2001 – AS Registered Nurse, Grand Rapids Community College

#### **Business Experience**

- 2011 – Present, ClearView Investments, LLC, Investment Advisor Representative
- 2007 – Present, ClearView Insurance, Agent
- 2007 – Present, HBW Insurance & Financial Services, Agent
- 2008 – Present, Hardt Insurance, Agent

## Item 3: Disciplinary Information

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

## Item 4: Other Business

ActivitiesLori Kay Holzhueter is currently a registered nurse and licensed insurance agent. From time to time, she will offer clients advice or products from those activities. Clients should be aware that insurance services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. CVI always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CVI in their capacity as an insurance agent.

## Item 5: Additional Compensation

Other than salary, annual bonuses, regular bonuses, or commissions received from insurance sales, Lori Kay Holzhueter does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through ClearView Investments, LLC.



## Item 6: Supervision

As a representative of Clearview Investments, LLC, Lori Holzhueter works closely with supervisor Karl G Holzhueter, and all advice provided to clients is reviewed by this supervisor prior to implementation. Karl Holzhueter can be reached at (616) 540-3326. Lori Holzhueter adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

## Item 7: Requirements for State Registered Advisers

Lori Holzhueter has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



ClearView Investments, LLC

1360 Baldwin St  
Jenison, MI 49428  
616-667-8990

Dated March 13th, 2021

Form ADV Part 2B – Brochure Supplement

*For*

**Owen Claude Scott CRD #7284097**

Investment Advisor Representative

This brochure supplement provides information about Owen Scott that supplements the ClearView Investments, LLC (“CVI”) brochure. A copy of that brochure precedes this supplement. Please contact Owen Scott if the CVI brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Owen Scott is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number CRD # 4329156.

## Item 2: Educational Background and Business Experience

### **Owen Claude Scott**

Born: 1992

#### **Educational Background**

- 2012 – 2017, BA Communications Marketing, Cornell University
- 2011 – 2012, Tompkins Community College, Student

#### **Business Experience**

- 2020 – Present, ClearView Investments, LLC, Investment Advisor Representative
- 2017 – Present, ARERS Wrestling Club LLC, Owner

## Item 3: Disciplinary Information

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

## Item 4: Other Business Activities

Owen Scott is not engaged in any investment-related business or occupation (other than this advisory firm).

## Item 5: Additional Compensation

Owen Scott does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CVI.

## Item 6: Supervision

As a representative of Clearview Investments, LLC, Owen Scott works closely with supervisor Karl G Holzhueter, and all advice provided to clients is reviewed by this supervisor prior to implementation. Karl Holzhueter can be reached at (616) 540-3326. Owen Scott adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

# Item 7: Requirements for State Registered Advisers

Owen Scott has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.