



MOUNTAIN VIEW Financial Advisors

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Mountain View Financial Advisors. If you have any questions about the contents of this brochure, please contact Mountain View Financial Advisors' Chief Compliance Officer, Micah Landis, at (702) 802- 3400 or by email at : mlandis@mountainviewfa.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Mountain View Financial Advisors is also available on the SEC's website at www.adviserinfo.sec.gov. Mountain View Financial Advisors' CRD number is: 297765.

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Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 3/24/2023

Item 2: Material Changes

Mountain View Financial Advisors

Since the last annual amendment filed on 3/14/2022, MVFA has the following material changes to disclose:

- Assets Under Management (AUM) was updated.
- Portfolio Management Fees were renamed as Wealth Management Fees
- As of 3/31/2023 fee schedules updated for all new clients. Existing client fees remain the same and are detailed in their individual advisory agreement.

MVFA will ensure that you receive a summary of any material changes to this and subsequent brochures annually and within 120 days of the close of MVFA's fiscal year.

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Item 4: Advisory Business

A. Description of the Advisory Firm

NV Prop Holdings LLC dba Mountain View Financial Advisors (hereinafter "MVFA") is a Limited Liability Company organized in the State of Nevada. The Firm was formed in June 2018, and the principal owner is Micah Landis.

B. Types of Advisory Services

Wealth Management Services

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

- Investment strategy
- Asset allocation
- Asset selection
- Risk tolerance
- Risk management
- Personal investment policy
- Regular portfolio monitoring
- Tax consulting
- Estate Plan consulting

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

MVFA seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its clients and without consideration of MVFA's economic, investment or other financial interests. To meet its fiduciary obligations, MVFA attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, MVFA's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is MVFA's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis.

Pension Consulting Services

MVFA offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Financial Planning and Business Consulting

Financial Planning and Business Consulting may include but are not limited to investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. Business consulting may include topics not covered under general financial planning services.

Services Limited to Specific Types of Investments

MVFA generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), equities, ETFs, treasury inflation protected/inflation linked bonds and non-U.S. securities, although MVFA primarily recommends ETF's, index funds, primarily passive investments. MVFA may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

MVFA will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by MVFA on behalf of the client. MVFA may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Generally, clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. MVFA does not participate in wrap fee programs.

E. Assets Under Management - as of December 31, 2022

| Discretionary Amounts: | Non-discretionary Amounts: | Date Calculated: |
|------------------------|----------------------------|------------------|
| \$21,877,250 | \$3,256,869 | Dec. 31, 2022 |

Item 5: Fees and Compensation

A. Fee Schedule

Wealth Management Fees

Below is the updated fee schedule for new clients effective March 31, 2023.

Existing client fees are detailed in their individual advisory agreement.

| Total Assets Under Management | Annual Fees |
|-------------------------------|-------------|
| \$0 - \$1,000,000 | 1.00% |
| \$1,000,001 - \$2,000,000 | 0.50% |
| \$2,000,001 - \$3,000,000 | 0.25% |
| \$3,000,001 and Up | 0.10% |

Minimum fees for clients are \$2500 annually not to exceed 1.5% of AUM. Clients with managed assets less than \$250,000 annually may be charged fees up to 1.5% of Assets Under Management (AUM) due to minimum fees.

MVFA uses a tiered annual fee schedule in which each tier of assets is charged a different rate under the annual fee schedule creating the effect of a blended fee rate used at the time of billing.

Fees are paid monthly in arrears. MVFA uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. Our Firm bills on cash unless indicated otherwise in writing.

These fees are negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of MVFA's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Pension Consulting Services' Fees

Below are the updated fee schedules for new clients effective March 31, 2023.

Existing client fees are detailed in their Pension Consulting Agreement.

IRA Based and Solo 401(k) Profit Sharing Plans

Simple IRA's, SEP IRA's, Solo 401(k) / Profit Sharing Plans

Includes Administration, Investment Management and Participant Education Only as defined in the client engagement letter.

| Total Assets Under Management | Annual Fee |
|--------------------------------------|-------------------|
| \$0 - \$1,000,000 | 1.00% |
| \$1,00,001 - \$2,000,000 | 0.50% |
| \$2,000,001 - \$3,000,000 | 0.25% |
| \$3,000,001 and Up | 0.10% |

Initial Set Up: \$150 Fixed Fee – Per Participant. Fee billed in arrears to the Plan Sponsor. There is no minimum fee.

MVFA uses a tiered annual fee schedule in which each tier of assets is charged a different rate under the annual fee schedule creating the effect of a blended fee rate used at the time of billing.

AUM fees are billed monthly in arrears. MVFA uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. Our Firm bills on cash unless indicated otherwise in writing.

Clients may terminate the agreement without penalty for a full refund of MVFA's fees within five business days of signing the Pension Consulting Agreement. Thereafter, clients may terminate the Pension Consulting Agreement immediately upon written notice.

Advisory services Assets Under Management (AUM) fees are in addition to Recordkeeper, Custodian, Mutual Fund / Exchange Trade Fund and Other Service Providers fees.

Group Business Retirement Plans - Defined Benefit

Plans with 1 - 50 Participants.

Includes Administration, Investment Management and Participant Education Only as defined in the client engagement letter.

| Total Assets Under Management | Annual Fee |
|--------------------------------------|-------------------|
| \$0 - \$1,000,000 | 1.00% |
| \$1,00,001 - \$2,000,000 | 0.50% |
| \$2,000,001 - \$3,000,000 | 0.25% |
| \$3,000,001 and Up | 0.10% |

Initial Set Up: \$150 Fixed Fee. Fees are billed monthly in arrears. There is no minimum fee.

MVFA uses a tiered annual fee schedule in which each tier of assets is charged a different rate under the annual fee schedule creating the effect of a blended fee rate used at the time of billing.

AUM fees are billed monthly in arrears. MVFA uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. Our Firm bills on cash unless indicated otherwise in writing.

Clients may terminate the agreement without penalty for a full refund of MVFA's fees within five business days of signing the Pension Consulting Agreement. Thereafter, clients may terminate the Pension Consulting Agreement immediately upon written notice.

Advisory services Assets Under Management (AUM) fees are in addition to Recordkeeper, Custodian, Mutual Fund/ Exchange Trade Fund and Other Service Providers fees.

Group Business Retirement Plans - Defined Contribution

Plans with 2 - 50 Eligible Participants.

Includes Administration, Investment Management (3(38)) and Participant Education Only as defined in the client engagement letter.

| Total Assets Under Management | Annual Fee |
|--------------------------------------|-------------------|
| \$0 - \$3,000,000 | 0.50% |
| \$3,000,001 - \$5,000,000 | 0.30% |
| \$5,000,001 and Up | 0.10% |

There is \$2500 annual minimum fee which is offset by asset under management fees paid.

Fees are billed quarterly in arrears to the Plan Sponsor. The fees are based on the end of quarter Assets Under Management (AUM).

Advisory services Assets Under Management (AUM) fees are in addition to Recordkeeper, Custodian, Mutual Fund/ Exchange Trade Fund and Other Service Providers fees.

These fees are negotiable, and the final fee schedule will be memorialized in the client's advisory agreement.

Clients may terminate the agreement without penalty for a full refund of MVFA's fees within five business days of signing the Pension Consulting Agreement. Thereafter, clients may terminate the Pension Consulting Agreement immediately upon written notice.

Financial Planning and Business Consulting Fees

Below are the updated fee schedules for new clients effective March 31, 2023.

No asset management or additional work will be performed beyond the scope of the engagement letter.

Existing client fees are detailed in their individual advisory agreement.

Initial Review Meeting

The initial meeting with a client, which is 30 - 60 minutes, is complementary - no charge.

Hourly Fees

Hourly fee for financial planning and business consulting is \$350. Fee is negotiable and defined in the engagement letter. Fees will be billed in arrears upon delivery of the plan or completion of the agreed services.

Project Flat Fixed Fees

MVFA may charge a negotiable project flat fixed fee for financial planning or business consulting services ranging from \$700 to \$10,000, the total dependent upon the level of depth and scope of these services. The scope and cost of our services are defined in in the engagement letter and will depend on the complexity of the situation. Fees are negotiable.

Clients may terminate the agreement without penalty, for full refund of MVFA's fees, within five business days of signing the Financial Planning or Business Consulting agreement. Thereafter, clients may terminate the Financial Planning or Business Consulting agreement generally upon written notice. The client will be billed for actual hours logged at MVFA's hourly rate.

MVFA has a conflict of interest because it offers both financial planning and investment management services. When providing financial planning services, MVFA has an incentive to recommend itself for investment management services as MVFA receives additional

compensation. MVFA mitigates this conflict of interest by disclosing this conflict to you and disclosing that clients always have the right to decide whether to act on any of the recommendations made by MVFA and if you elect to act on any of the recommendations, you have the right to effect the transactions through a professional unaffiliated with MVFA. Our fiduciary obligation is to always act and recommend in the clients' best interest.

For clients who also engage MVFA for Wealth Management services, MVFA may waive or offset all or a portion of its fees for the financial planning and/or business consulting services.

B. Payment of Fees

Payment of Wealth Management Fees

Asset-based wealth management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

Payment of Pension Consulting Fees

Asset-based pension consulting fees, which include IRA Based, Solo 401(k) Profit Sharing plans and Defined Benefit plans are withdrawn directly from the client's accounts with the client's written authorization on a monthly basis. Fees are paid in arrears.

Payment of Group Business Retirement Defined Contribution Plans fees are billed quarterly in arrears to the Plan Sponsor. The annual minimum fee is evaluated annually. The fees are based on the end of quarter Assets Under Management (AUM).

Payment of Financial Planning and Business Consulting Fees

Payment of Financial Planning Fees and Business Consulting Fees. Business Consulting fees are billed on an hourly or project basis and billed in arrears and to the client directly. Financial planning fees are paid via check and wire.

Payment of Business Services Fees. Business Services include payroll services, bookkeeping, and other business-related services. The fees are billed in arrears and to the business directly.

C. Client Responsibility for Third Party Fees

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

D. Prepayment of Fees

MVFA collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation for the Sale of Securities to Clients

Neither MVFA nor its supervised person accepts any compensation for the sale of 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

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

Item 7: Types of Clients

MVFA generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit-Sharing Plans
- ❖ Corporations or Business Entities

MVFA has account minimums for some services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis MVFA's methods of analysis include Business Cycle Analysis, Modern Portfolio Theory, and long-term trading:

Business Cycle Analysis uses the analysis of business cycles to find favorable conditions for buying and/or selling a security

Modern Portfolio Theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

MVFA uses long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

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

Modern Portfolio Theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long Term Trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed Income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and

fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Real Estate Funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Non-U.S. securities present risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions / Administrative Proceedings

There are no criminal or civil actions to report. There are no administrative proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

Neither MVFA nor its representative is registered as, nor has a pending application to become, a broker/dealer or a representative of a broker/dealer.

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

Neither MVFA nor its representative is registered as or has a pending application to become, either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

Micah Landis Sole Proprietor DBA Mountain View Consulting currently offers clients insurance services. MVFA offers business services, including payroll, and bookkeeping. Clients should be aware that insurance services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. MVFA acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of MVFA in connection with such individual's activities outside of MVFA. Bookkeeping and payroll service will continue to be offered through MVFA for a monthly fee that ranges from \$75-500.

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

MVFA does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

MVFA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. MVFA's Code of Ethics is available for free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, a representative of MVFA may buy or sell securities for himself that he also recommends to clients. This may provide an opportunity for representatives of MVFA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting from the recommendations they provide to clients. Such transactions may create a conflict of interest. MVFA will document any transactions that could be construed as a conflict of interest and will not engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

From time to time, a representative of MVFA may buy or sell securities for himself at or around the same time as clients. This may provide an opportunity for a representative of MVFA to buy or sell securities before or after recommending securities to clients resulting in a representative profiting from the recommendations he provides to clients. Such transactions may create a conflict of interest; however, MVFA will not engage in trading that operates to the client's disadvantage if a representative of MVFA buys or sells securities at or around the same time as clients.

Item 12: Brokerage Practices

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

Custodians/broker-dealers will be recommended based on MVFA's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and MVFA may also consider the market expertise and research access provided by the broker- dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in MVFA's research efforts. MVFA will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker- dealer/custodian.

MVFA will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

1. Research and Other Soft-Dollar Benefits

MVFA may receive certain research, products, or other services from custodians and broker- dealers in connection with client securities transactions ("soft dollar benefits"). MVFA may enter into soft-dollar arrangements consistent with and outside of the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and MVFA does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. MVFA benefits by not having to produce or pay for the research, products or services, and MVFA will have an incentive to recommend a broker-dealer based on receiving

research or services. Clients should be aware that MVFA's acceptance of soft dollar benefits may result in higher commissions charged to the client.

1. Brokerage for Client Referrals

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

2. Clients Directing Which Broker/Dealer/Custodian to Use

MVFA will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If MVFA buys or sells the same securities on behalf of more than one client, then it may aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, MVFA would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. MVFA would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

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

All client accounts for MVFA's advisory services provided on an ongoing basis are reviewed at least Annually by Micah Landis, President, with regard to clients' respective investment policies and risk tolerance levels. All accounts at MVFA are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Micah Landis, President. Financial planning clients are provided a one-time financial plan concerning their financial situation.

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

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

With respect to financial planning, MVFA's financial planning services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of MVFA's advisory services which are provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. MVFA will also provide at least quarterly a separate written statement to the client.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

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

MVFA participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. MVFA receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, MVFA participates in TD Ameritrade's institutional advisor program and MVFA may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between MVFA's participation in the Program and the investment advice it gives to its clients, although MVFA receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving MVFA participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have MVFA's fees deducted directly from client accounts; access to an electronic communications' network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to MVFA by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by MVFA's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit MVFA but may not benefit its client accounts. These products or services may assist MVFA in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help MVFA manage and further develop its business enterprise. The benefits received by MVFA or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, MVFA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by MVFA or its related person in and of itself creates

a conflict of interest and may indirectly influence the MVFA's choice of TD Ameritrade for custody and brokerage services.

B. Compensation to Non - Advisory Personnel for Client Referrals

MVFA does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, MVFA will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Third Party Money Movement:

On February 21, 2017, the SEC issued a no-action letter ("Letter") with respect to Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of authorization ("SLOA") is deemed to have custody. As such, our Firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.

The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

MVFA provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, MVFA generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, MVFA's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to MVFA).

Item 17: Voting Client Securities (Proxy Voting)

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

Item 18: Financial Information

A. Balance Sheet

MVFA neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

Neither MVFA nor its management has any financial condition that is likely to reasonably impair MVFA's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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

Item 19: Requirements for State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

MVFA currently has only one management person: Micah Sage Landis. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

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

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have with Issuers of Securities (If Any)

See Item 10.C and 11.B.