



With our discerning eye, your profits will magnify!

**11546 68th St. N.
WEST PALM BEACH, FL 33412
407-538-1881
www.valueview.net
frontdesk@valueview.net**

**Value View Financial Corp.
CRD #122558
Firm Brochure**

(Part 2A of Form ADV)

3/30/2022

This brochure provides information about the qualifications and business practices of VALUE VIEW FINANCIAL CORP.. If you have any questions about the contents of this brochure, please contact us at: 407-538-1881, or by email at: FRONTDESK@VALUEVIEW.NET. 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 VALUE VIEW FINANCIAL CORP. is available on the SEC's website at www.adviserinfo.sec.gov.

Value View Financial Corp.

Material Changes

Annual Update

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

Material Changes since the Last Update

Aside from the following, there are no material changes to report since the last update in January 2021. The only updates reflect marginal changes to size and number of assets under management as of the date of submission and non-material editorial changes to improve clarity. Some additional detail was added with regards to our policy on client information confidentiality and cybersecurity.

It is noted that the firm is no longer registered in the State of Maryland. This registration was allowed to expire since the firm no longer has an office in the state and maintains no clients there.

This disclosure brochure has been reviewed and is current as of the date of submission.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 407-538-1881 or by email at: FRONTDESK@VALUEVIEW.NET.

Table of Contents

Material Changes	ii
Annual Update	ii
Material Changes since the Last Update	ii
Full Brochure Available	ii
Advisory Business	1
Firm Description.....	1
Principal Owners.....	1
Types of Advisory Services.....	1
Tailored Relationships	1
Types of Agreements.....	2
Asset Management Agreement.....	2
Asset Management	2
Retainer Agreement.....	3
Hourly Consultation Engagements.....	3
Termination of Agreement	3
Fees and Compensation	3
Description	3
Fee Billing	5
Other Fees	5
Expense Ratios.....	5
Past Due Accounts and Termination of Agreement	6
Performance-Based Fees	7
Sharing of Capital Gains	7
Types of Clients	7
Description	7
Account Minimums.....	7
Methods of Analysis, Investment Strategies and Risk of Loss	8
Methods of Analysis.....	8
Investment Strategies	9
Risk of Loss	9

Disciplinary Information	10
Legal and Disciplinary	10
Other Financial Industry Activities and Affiliations	10
Financial Industry Activities	10
Affiliations	10
Code of Ethics, Participation in Client Transactions and Personal Trading	
.....	1
0	
Code of Ethics	10
Participation or Interest in Client Transactions	11
Personal Trading	11
Brokerage Practices	12
Selecting Brokerage Firms	12
Soft Dollars	13
Best Execution	13
Order Aggregation	14
Review of Accounts	15
Periodic Reviews	15
Review Triggers	15
Regular Reports	15
Client Referrals and Other Compensation	16
Incoming Referrals	16
Referrals Out	16
Other Compensation	16
Custody	17
Accounts Statements	17
Performance Reports	17
Conflicts of Interest	17
Investment Discretion	18
Discretionary Authority for Trading	18
Limited Power of Attorney	18

Voting Client Securities	19
Proxy Votes	19
Financial Information	19
Financial Condition	19
Business Continuity Plan	20
General	20
Disasters	20
Alternate Offices	20
Loss of Key Personnel	20
Information Security Program.....	20
Information Security	20
Privacy Notice	20
State-Registered Advisors	21
Brochure Supplement (Part 2B of Form ADV)	22
Education and Business Standards	23
Richard Scott Pearson	23

Advisory Business

Firm Description

VALUE VIEW FINANCIAL CORP. was founded in 1999.

VALUE VIEW FINANCIAL CORP. provides personalized confidential investment management to individuals and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, investment management, education funding, and strategic solutions to meeting retirement goals.

VALUE VIEW FINANCIAL CORP. is strictly a fee-only investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Principal Owners

Richard Scott Pearson is a 100% stockholder.

Types of Advisory Services

VALUE VIEW FINANCIAL CORP. provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment advice through consultations; issues special reports about securities; and issues charts, graphs, formulas, or other devices which clients may use to evaluate securities.

As of March 31, 2022, VALUE VIEW FINANCIAL CORP. managed \$2.42 million in assets, all of which is managed on a discretionary basis. VALUE VIEW FINANCIAL CORP. presently does not handle any accounts on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system and account types are outlined in our Asset Management Agreement. Freedom Approach clients may impose restrictions on investing in certain securities or types of securities and may also personalize their account management by directing VALUE VIEW FINANCIAL CORP. to utilize certain strategies or combinations of strategies.

Types of Agreements

The following agreements define the typical client relationships.

Asset Management Agreement

Clients typically choose to have VALUE VIEW FINANCIAL CORP. manage their assets in order to obtain ongoing in-depth advice. The client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Asset Management Agreement is provided to the client in writing prior to the start of the relationship. An Asset Management Agreement includes: investment management (including performance reporting); education funding; cash-flow management; strategies to achieve retirement goals; as well as the implementation of recommendations within each area.

Although the Asset Management Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the period completed or any amounts previously collected will be refunded on a pro rata basis. The portfolio value at the completion of the prior full billing term is used as the basis for the fee computation, adjusted for the number of days during the billing period prior to termination.

Asset Management

Assets are invested primarily through discount brokers.

Investments may also include: equities (stocks), corporate debt securities (bonds), commercial paper, certificates of deposit, warrants, municipal securities, investment company securities (such as exchange-traded funds (ETF), and mutual funds shares), U. S. government securities, commodities, options contracts, futures contracts, foreign currencies, and interests in partnerships.

Discount brokerages may charge a transaction fee for the purchase of some funds. VALUE VIEW FINANCIAL CORP. may, on occasion, select no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus.

Stocks, bonds, and other assets may be purchased or sold through a brokerage account when appropriate. The brokerage firm may charge a commission or fee for these transactions. VALUE VIEW FINANCIAL CORP. does not receive any compensation, in any form, from fund companies, brokers, or any other investment provider.

Initial public offerings (IPOs) are not typically available through VALUE VIEW FINANCIAL CORP.

Retainer Agreement

In some circumstances, a Retainer Agreement may be executed in lieu of an Asset Management Agreement when it is more appropriate to work on a fixed-fee basis. While VALUE VIEW FINANCIAL CORP. is currently not engaged in any contracts on retainer, services are available in that form.

Hourly Consultation Engagements

VALUE VIEW FINANCIAL CORP. occasionally may provide hourly consultation services for clients who need advice on a limited scope of work.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying VALUE VIEW FINANCIAL CORP. in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, VALUE VIEW FINANCIAL CORP. will refund any unearned portion of the advance payment.

VALUE VIEW FINANCIAL CORP. may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, VALUE VIEW FINANCIAL CORP. will refund any unearned portion of the advance payment.

Fees and Compensation

Description

VALUE VIEW FINANCIAL CORP. bases its fees on a percentage of net assets under management and hourly charges. The vast majority of VALUE VIEW FINANCIAL CORP. advisory billings are derived from the provision of investment supervisory services to clients. The annual fee shall be determined by the nature and size of the account. The firm offers three types of accounts to its clients.

The first account option is The Freedom Standard Approach

- **The Freedom Standard Approach**

The freedom Standard Account provides clients with individualized, customized asset management in the long-standing Value View tradition. VVFC will work with the client to design and create a premier portfolio according to the client's preferences. Your portfolio manager will work with you directly to develop an investment approach which is uniquely designed according to your investment profile. This includes, but is not limited to, strategic diversification, ethical investing plans, capital gains management, year-end tax-loss selling, effective plans for scheduled withdrawals, or any special preferences that the client indicated in their communication to VVFC. This is the

portfolio management model that Value View is known for, and what we recommend to most clients.

The annual fee for Freedom Approach accounts shall be one and a half percent (1.5%) for accounts under \$200,000; a fixed fee of \$3,000 for accounts between \$200,000 and \$300,000; one percent (1%) for accounts between \$300,000 and \$900,000, a fixed fee of \$9,000 for accounts between \$900,000 and \$1 million; above \$1 million: nine tenths of one percent (.90%) for the 1st million; eight tenths of one percent (.80%) for the second million. The annual fee for portfolio and customized accounts of more than \$2 million shall be negotiable. A minimum fee of \$300 will be assessed to Freedom Approach accounts between \$10,000 and \$20,000.

- **The Automated Portfolio**

The Automated Portfolio provides clients with asset management modeling automation technology. Tools are available to assist with a variety of investment and diversification strategies and adjust and rebalance the client's portfolio on a regular basis, but with little or no oversight from portfolio managers. Once the model has been set in place, the algorithms will determine optimal portfolio adjustments.

The annual fee for Automated Portfolio accounts shall be three quarters of one percent (.75%) for accounts under \$200,000; a fixed fee of \$1,500 for accounts between \$200,000 and \$300,000; one half of one percent (.50%) for accounts between \$300,000 and \$900,000, a fixed fee of \$4,500 for accounts between \$900,000 and \$1 million; above \$1 million: forty five one hundredths of one percent (.45%) for the 1st million; four tenths of one percent (.40%) for the second million. The annual fee for portfolio and customized accounts of more than \$2 million shall be negotiable.

- **The First Step Plan**

The First Step Plan is intended for beginning investors who commit to making regular deposits, and is designed to help new investors get started on their progression to building wealth. Money will be invested in a portfolio of selected mutual funds, ETF's and other investments selected to achieve diversification. The client commits to adding funds to the portfolio according to the schedule designed by the client. VVFC may notify client and cease management if commitments are not met. Communications between client and VVFC will determine further action as needed. **The First Step Plan is restricted to accounts under \$75,000.

The annual fee for First Step accounts shall be one quarter of one percent (.25%).

In any event, the advisory fee for any type of account shall not exceed 3% annually of

net assets under management.

The annual Asset Management Agreement fee structure is based on a percentage of the investable assets according to the following schedule:

Annual Fee Schedule:

Account Size (\$)	Freedom Std. Approach Individual/Customized Min. Investment: \$20,000*	AutomatedPortfolio Regularly Rebalanced Min. Acct. Size: \$20,000	The First Step Plan Mutual Funds; No minimum
	Minimum Fee: \$300.00		
<200,000	1.50%	0.75%	0.25%
200,000 to 300,000	Fixed \$3,000	Fixed \$1,500	N/A
300,000 to 900,000	1%	0.50%	N/A
900,000 to 1 million	Fixed \$9,000	Fixed \$4,500	N/A
1 million and above:	1 st million: 0.90% 2 nd million: 0.80% >2 million: negotiable	1 st million: 0.45% 2 nd million: 0.40% > 2 million: negotiable	N/A

- State law in certain jurisdictions prohibits annual management fees in excess of 3%. Accordingly, we have established minimum investment guidelines to enable us to offer the type of customized service associated with this account. Clients should contact VVFC to discuss other options if they do not fit this minimum requirement.

Fee Billing: Regardless of account type, the annual fee are billed and paid in four quarterly forward-looking installments. We invoice you shortly after the three-month billing period has begun. Payment in full is expected upon invoice presentation. Fees are normally deducted from a designated client account to facilitate payment. Each client must consent in advance to direct debiting of their investment account. Each installment of the fee will be calculated by multiplying the beginning balance of the account for that three month billing period by the prorated share of the annual percentage charged. For instance, VALUE VIEW FINANCIAL CORP. may bill a "Freedom Approach" client \$4,000.00 near the beginning of a period if the client had a balance of \$400,000 (1% fee). The "beginning balance" used in the above calculations will be the balance of the client's account on the date of the brokerage statement closest to the first day of the period. This date will be called the "account valuation date." VALUE VIEW FINANCIAL CORP. will not charge any fee higher than the agreed upon fee percentage stated in the asset management agreement.

Deposits and Withdrawals: Assets deposited by you into your managed portfolio account between billing cycles will not result in additional management fees being billed to you unless such deposits exceed \$25,000. We do not want to discourage you from investing

additional capital for your future but deposits of this amount or greater, in most cases, will require modifications and adjustments to your investment allocation. Therefore, a pro-rated fee similar to what is disclosed above under "Billing" for new accounts may be assessed for deposits in excess of \$25,000.

For assets you may withdraw, we do not generally make partial refunds of your quarterly management fees unless the size of the withdrawal is significant enough to warrant re-evaluation of fee payments similar to that listed above. As with deposits, withdrawals may require modifications and adjustments to be made in the account to correct your allocation of assets.

Fees and Exclusions: The above fees for all of our management services are exclusive of any charges imposed by the custodial firm. These fees may include, but are not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or account charges, including postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. There can also be other fees charged to your account by entities that are unrelated to our management services. In addition, all fees paid to us for portfolio management services are separate from any fees and expenses charged on mutual fund shares by the investment company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as: redemption fees, account fees, and purchase fees may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. You are encouraged to carefully read the fund prospectus. The expense ratio for each fund is available in the documentation, and Value View strives to select investments through arrangements that minimize fees and expenses. Performance figures quoted by mutual fund companies are normally calculated after their fees have been deducted. The transaction charges we engage are usually small and incidental to the purchase or sale of a security. We contend that the selection of the security is more important than the nominal fee that the custodian may charge on the sale or purchase, and tend to avoid high-fee transactions where possible.

Most relationships are based on the above fee structure for asset management, and clients under such an agreement would not encounter additional hourly or retainer fees. However, in some unique cases, a particular client may choose a different relationship based upon hourly consultation fees or retainer fees. The hourly rate for limited scope engagements is normally \$100 but this rate is negotiable. Retainer Agreements may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship. Retainer Agreement fees are always negotiable, but typically would only be available when the scope of the services would justify fees in excess of \$5,000 per year.

Fees are negotiable only where so stated.

Past Due Accounts and Termination of Agreement

VALUE VIEW FINANCIAL CORP. reserves the right to stop work on any account that is more than 60 days overdue. In addition, VALUE VIEW

FINANCIAL CORP. reserves the right to terminate any management agreement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in VALUE VIEW FINANCIAL CORP.'s judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded.

The professional relationship may be terminated at will by either VALUE VIEW FINANCIAL CORP. or the client and such termination must be in writing.

Performance-Based Fees

Sharing of Capital Gains

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

VALUE VIEW FINANCIAL CORP. does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client than is appropriate.

Types of Clients

Description

VALUE VIEW FINANCIAL CORP. generally provides investment advice to individuals and corporations or business entities. Clients vary greatly in focus, economic status, and stage of life. VALUE VIEW FINANCIAL CORP. offers three different account types to meet the needs of different clients. Account types are: The First Step Plan, The Freedom Standard Approach, and the Automated Portfolio.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size in assets under management for The Freedom Standard Approach and The Automated Portfolio is \$20,000, though some flexibility is granted in individual cases amidst volatile markets.

If a Freedom Standard Approach or Automated Portfolio falls below \$20,000 in value, the Client may be offered different plan options such as The First Step Plan, tailored to their needs until sufficient assets are available to meet the minimum as stated above, or minimums may be temporarily waived in order to facilitate management.

VALUE VIEW FINANCIAL CORP. generally has the discretion to waive the

account minimum. Accounts of less than the required amount may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to the required amount within a reasonable time. Similar exceptions may apply to employees of VALUE VIEW FINANCIAL CORP., or family members of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Our portfolio management approach incorporates the individual needs of each client with a view toward their unique financial needs, investment objectives, time horizon, and risk tolerance, incorporating each of these in the development of an investment strategy suited to the particular client. Your portfolio is then tailored to these parameters using a variety of investment tools, primarily including equities (stocks), debt instruments (bonds), and cash equivalents, sometimes within the context of a mutual fund or ETF (exchange-traded fund).

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes a Client Profile that documents their objectives and their desired investment strategy.

Security analysis methods for analyzing stocks, ETF's, bonds, and mutual funds will focus primarily on fundamental analysis, coupled with a view to macroeconomic trends. Analysis may also occasionally utilize other methods when circumstances warrant to guide us in our management decisions.

Fundamental Analysis

Fundamental analysis considers: economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits.

Quantitative Analysis

Quantitative analysis seeks to understand the behavior of a security using mathematical and statistical modeling to measure certain unique characteristics such as, for example, revenues, earnings, margins, and market share. Mathematical and statistical modeling may help us to ascertain security price and risk to ultimately help identify profitable opportunities.

Technical Analysis

Technical analysis utilizes current and historical pricing information to help us identify trends in the broader domestic and foreign equity and fixed income markets, and in the underlying assets themselves. This may involve the use of various technical indicators, such as moving averages and trend-lines, among others.

Cyclical Analysis

Market cycles provide historic tried and true timing mechanisms to indicate turning points in future market prices. By tracking historic data through charts and graphs we can improve entry and exit timing strategies. Coupling cyclical analysis with technical analysis helps to ensure the most favorable buy/sell signal.

Fundamental analysis provides us with a broad long-term view of a security that begins with determining a company's value and the strength of its financials while technical analysis is short-term focusing on the statistics generated by market activity. Quantitative analysis assists us with portfolio optimization. Cyclical analysis provides us with historical data on market trends to focus our technical analysis for ideal entry/exit points.

The main sources of information include financial publications, inspections of corporate activities and reports, prospectuses, research materials prepared by others, corporate rating services, trade journals, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation. Portfolios are globally diversified to control the risk associated with traditional markets.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, and margin transactions.

Risk of Loss

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

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or

a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

VALUE VIEW FINANCIAL CORP. is not registered as a securities broker-dealer, a futures commission merchant, or commodity pool operator.

Affiliations

VALUE VIEW FINANCIAL CORP. has no arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, commodity pool operator, commodity trading advisor or futures commission merchant, bank, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

VALUE VIEW FINANCIAL CORP. and its employees have a fiduciary duty to ensure that clients' welfare is not subordinated to any interests of ours.

Code of Ethics

The employees of VALUE VIEW FINANCIAL CORP. have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

It is against the firm's policy for VALUE VIEW FINANCIAL CORP. or its employees, officers, directors or owners to invest with a client or group of clients in any non-marketable investment unless prior approval has been granted by the firm's compliance officer, and that such investment is not in violation of any SEC and/or State rules and regulations. Employees comply with the provisions of the VALUE VIEW FINANCIAL CORP. Compliance Manual. As a general practice, such investments are strongly discouraged.

Personal Trading

The Chief Compliance Officer of VALUE VIEW FINANCIAL CORP. is R. Scott Pearson. Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Most of the time, such investment purchases are independent of, and not connected in any way to, the investment decisions made on your behalf. Since many employee trades are small, and involve only mutual fund trades or exchange-traded fund trades, we believe the trades do not normally affect the securities markets in any significant way. However in an effort to ensure that no conflict of interest between VALUE VIEW FINANCIAL CORP., its related persons, and our clients becomes consequential, the Chief Compliance Officer closely tracks the securities transactions of any persons who have prior access to client trading information. In this way, we are able to ensure that client interests are given priority, and that any conflict of interest, no matter how small, is controlled and monitored. We have implemented the following guidelines in order to ensure our fiduciary integrity:

1. We maintain a list of all securities holdings and transactions for all employees. The firm's Chief Compliance Officer reviews these holdings on a regular basis to ensure that the personal trading of employees does not significantly affect the markets, and that clients of the firm receive preferential treatment.
2. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
3. No employee acting as an Investment Advisor Representative (RA), or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee may trade in front of clients or otherwise utilize their prior access to client trading information in any way that advantages themselves over clients.
4. Bunched orders (See "Trading Allocation" above) may include employee accounts. In such cases, priority and advantage will be given to satisfy your order first regardless of the situation. Furthermore, employees shall not "block trade" with clients exclusively to attempt to receive a better price.

5. Any individual not in observance of the above may be subject to termination.

Brokerage Practices

Selecting Brokerage Firms

VALUE VIEW FINANCIAL CORP. does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. VALUE VIEW FINANCIAL CORP. recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

VALUE VIEW FINANCIAL CORP. suggests discount brokerage firms (qualified custodians), such as TD Ameritrade/Charles Schwab, Interactive Brokers, etc. to clients. VALUE VIEW FINANCIAL CORP. will provide new clients with a list of available brokers with whom VALUE VIEW FINANCIAL CORP. can interface through an investment advisor portal or is otherwise able to interact with. The fee structure and relative strengths and weaknesses of each broker, as understood by VALUE VIEW FINANCIAL CORP., will be explained in as much detail as is possible at the time. This process will culminate with VALUE VIEW FINANCIAL CORP. suggesting a few of the brokers but not endorsing any one broker individually. Some of these custodians may offer services to advisory firms, including custody of securities, trade execution, clearance and settlement of transactions, and transaction reporting. Providing this information to clients regarding potential custodians has no direct correlation to the services we receive from any of the brokers, and the investment advice we offer is completely independent from the services provided by custodians. New clients will ultimately make the decision as to which broker is selected. Moreover, clients can choose a broker not suggested by VALUE VIEW FINANCIAL CORP. VALUE VIEW FINANCIAL CORP. will consider the anticipated level of activity for each new account, the liquidity needs of each new client, the quoted rate of interest that the client can earn on funds placed in the account but not invested, or that they might pay on margin balances, the broker's customer service features, the broker's ability to gain "best execution" on orders placed with them, and other factors, in deciding which brokers to suggest. The level of activity, any fixed fee and the variable rate of market, limit and stop orders will be considered when describing the reasonableness of each broker's fees given the circumstances surrounding each new account.

In the course of business, VALUE VIEW FINANCIAL CORP. often receives from the above mentioned brokers some subsidiary services, such as internet access to client account information, downloads of transaction data, duplicate statements of client accounts, the ability to directly deduct fees from client accounts, compliance support, access to research, trading software, access

to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts) and to a dedicated trading desk and to an electronic communication network for order entry, access to mutual funds without transaction fees, and technology support. These services are provided by brokers in order to facilitate management of client accounts in a way that typically is more efficient than the alternative, and we believe that provision of these services is in the best interest of clients. However, provision of such services might pose a conflict of interest to investment advisors, by encouraging them to steer business to particular brokers who provide better services and better access to useful research tools. This is why final decision about the selection of broker is always left to the client, and clients are advised to consider carefully all the costs and benefits of this selection.

VALUE VIEW FINANCIAL CORP. is not a subsidiary of, or an affiliated entity of TD Ameritrade, Charles Schwab, Interactive Brokers or any other custodian. VALUE VIEW FINANCIAL CORP. does not receive fees or commissions from any of these firms, and makes all investment decisions independently from any of these arrangements.

Soft Dollars

VALUE VIEW FINANCIAL CORP. strives to avoid arrangements to receive soft dollar credits or any other economic benefit from discount brokers or any other non-client, except as stated above.

However, there is potential for the advisor to receive a benefit because the advisor does not have to produce or pay for the research, products or services and the advisor may have an incentive to select or recommend a broker-dealer based on the advisor's interest in receiving the research or other products or services, rather than on the client's interest in receiving most favorable execution.

We strive to avoid arrangements that would lead to such conflicts, as we work to ensure that any soft dollars that we do receive do not interfere with our fiduciary duty to put client interests first.

Soft dollar arrangements are discouraged, due to potential conflicts of interest that may develop. No arrangements are accepted that would incline VALUE VIEW FINANCIAL CORP. or any team members to "steer" clients toward a particular broker or service provider.

Best Execution

VALUE VIEW FINANCIAL CORP. regularly reviews the execution of trades at each custodian. Trading commissions and fees charged by the custodians are also reviewed on a regular basis. VALUE VIEW FINANCIAL CORP. does not receive any portion of the trading fees. It is often perceived that the support services provided by custodians might create an economic benefit to

firms like ours, and therefore a conflict of interest. Nonetheless, we have a fiduciary duty to put client interests above our own, and therefore work to guide your decisions with regard to choice of custodian based upon the best options for all clients, given your individual circumstances. To this end, we provide clients with full information about their choices among available custodians. Selection of custodian might be based on some of the following factors:

1. Competitive transaction charges. We recognize that many custodians are currently offering zero commission services. These offers are tempting, and for some, may provide the best available option. Nonetheless, it is important to note that custodians that offer zero commissions make money on payment for order flow, and therefore may have a conflict of interest in directing orders to a venue that may not provide the best execution. Nonetheless, for some clients, the reduction in commissions can be more significant than the quality of execution.
2. Quality of trading platform, investment inventory, online services for account administration and operational support. Such services are an important consideration.
3. Custodian's general reputation for financial strength, and ethical framework. Some clients may be swayed by reputational factors.
4. Best execution: a key factor in this equation must always be the quality of execution of orders, and the likelihood that the custodian will direct the order to the best possible venue. This will allow for obtaining the best price available for the transaction. We recognize that a particular custodian may not always achieve the best possible execution of every order.

In helping clients weigh the costs and benefits of this dilemma, size of account and regularity of trading are factors that must be considered.

Order Aggregation

Transactions for each of our clients will generally be effected independently unless we decide to purchase or sell the same securities for several clients at approximately the same time, often termed "aggregated" or "batched" orders. We do not receive any additional compensation or remuneration as a result of aggregated transactions.

Our objective in order execution is to act fairly, impartially, and to take all reasonable steps to obtain the best possible trades (known as "best execution") for our clients. Therefore, we will not aggregate orders for a block trade unless: (i) the aggregation of orders is done for the purpose of achieving best execution; and, (ii) no client is systematically advantaged or disadvantaged by aggregating the orders.

In order to achieve these objectives, we will take into account the unique

execution factors of the buy/sell order before bunching accounts for a block trade. A few of those factors are:

1. Security Trading Volume – Bunching orders in a block trade can secure price parity and continuity for our clients during heavy trading activity.
2. Number of Clients – The fewer the number of client accounts involved in the bunched order, the less likely it will be to yield better pricing or order execution; it may be more advantageous to perform an individual market order for each client. In addition preparing individual market orders, for the small number accounts involved, may be quicker to complete than preparing a bunch order.
3. Financial Instruments – The type of security involved as well as the complexity of order can affect our ability to achieve best execution.

We may (but are not obligated to) aggregate orders in an attempt to obtain better execution, achieve favorable transaction rates, or to allocate equitably among our client accounts should there be differences in prices and commissions or other transaction costs that might have been obtained had such orders been separately placed.

Should we aggregate orders, transactions will generally be averaged as to price and allocated among each client on a pro-rated basis on any given day and we will attempt to do so in accordance with applicable industry rules. Client accounts where trade aggregation is not allowed or infeasible may be assessed higher transaction costs than those that are batched.

In the event we determine that a pro-rated allocation is not appropriate under particular circumstances, the allocation will be made based upon other relevant factors, which may include (in no particular order):

- When only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weighting relative to other portfolios with similar mandates;
- Allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts;
- If an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts, such as that which might occur due to unforeseen changes in an account's assets after the order is placed;
- When a pro-rated allocation of a potential executive would result in a *de minimis* allocation in one or more accounts, an account may be

excluded from the allocation and transactions may be executed on a pro-rated basis among the remaining accounts

We review both our trade aggregation procedures and allocation processes on a periodic basis to ensure they remain within stated policies and regulation. We will inform you, in advance, should our trade aggregation and allocation practices change at any point in the future.

Review of Accounts

Periodic Reviews

All accounts will be reviewed on a regular basis as agreed upon by the client. Additionally, the client may trigger a review by requesting one at any time. R. Scott Pearson, the President and Chief Investment Officer of the firm, will direct the reviews on all the client accounts.

Review Triggers

All clients will receive a report detailing the state of their account on at least a quarterly basis. This report will outline their holdings, transactions and all other pertinent information. Additionally, clients will receive trade confirmations every time there is activity in the account. Under no circumstance will the clients receive a report less frequently than on a quarterly basis. Moreover, clients will have access to a broker interface where they can receive updated information at their discretion. The client's holdings, account balance and account transactions will all be readily available to clients through this mechanism. Clients may request to receive all reports online, if they prefer.

Regular Reports

Accounts are regularly reviewed by the Chief Investment Officer, R. Scott Pearson. He considers the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications including a portfolio statement on at least an annual basis. Communications typically include a discussion of objectives and progress towards meeting those objectives.

Client Referrals and Other Compensation

Incoming Referrals

VALUE VIEW FINANCIAL CORP. has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

VALUE VIEW FINANCIAL CORP. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

VALUE VIEW FINANCIAL CORP. does not receive any economic benefit from any other sources for dispensing investment advice other than those disclosed herein.

Custody

As a general rule VALUE VIEW FINANCIAL CORP. does not take custody of client funds or affect asset transfers for our clients. VALUE VIEW FINANCIAL CORP.'s trading authorization allows us to buy/sell stocks for a client's account as well as collect management fees based upon the asset management agreement as invoiced. Never is VALUE VIEW FINANCIAL CORP. permitted to move money from one account to another.

Account Statements

All assets are held at qualified custodians which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Management Fee Deduction

Since we do not take possession of or maintain custody of your funds or securities, but simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines, most people would not interpret this as custody of client funds. However, amidst a period of transition of definitions, some regulatory bodies define authorization to deduct our advisory fees directly from the account as a form of "custody". With this in mind, to protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- We report all appropriate information to the appropriate regulatory authority (currently, the Florida Office of Financial Regulation) having jurisdiction over our advisory practice.
- Your funds and securities will be maintained with a qualified custodian in a separate account in your name.
- Prior to engaging any portfolio management services, clients must pre-authorize withdrawal of management fees from their account.
- At the time we request fee withdrawals, a notification invoice is sent to you itemizing our fee. Itemization includes the formula used to calculate fees, the amount of assets under management the fee is based on, and the time period covered.

Performance Reports

Custodians are required to provide you with statements, at least quarterly, summarizing the investments held in your account, the value of your portfolio, and account transactions. Clients are encouraged to compare the account statements received directly from their custodians to evaluate the performance of their accounts, and to compare this information with any performance report statements provided by VALUE VIEW FINANCIAL CORP. to verify the accuracy and correctness of our reporting.

Fiduciary Duty Owed

VALUE VIEW FINANCIAL CORP. takes seriously the trust our clients place in us and therefore seeks to fulfill fiduciary duty and prioritize the client's best interest. This includes but is not limited to the following:

Reasonable Basis Recommendations

VALUE VIEW FINANCIAL CORP. will only provide recommendations to clients that have been vetted by company investment analysts using independent market research.

VALUE VIEW FINANCIAL CORP. will make every effort to ensure that all information provided to clients is clear, precise, and appropriate for each client's best interest.

Conflicts of Interest

VALUE VIEW FINANCIAL CORP. receives research services, computer software, technical advice and publications, electronic database updates, marketing materials and services, and referrals of prospective new clients from financial product vendors and from financial services professionals. This may influence VALUE VIEW FINANCIAL CORP.'s Client preference in favor of doing business with these financial product vendors and financial services professionals. VALUE VIEW FINANCIAL CORP. agrees to use its best efforts to continue to act in Client's best interest.

Borrowing or Lending Money or Securities from a Client

Under no circumstances would VALUE VIEW FINANCIAL CORP. borrow money or securities from any client for any reason. In addition, employees are restricted from pursuing any such relationship with any client. In addition, the firm's policy also restricts loans to clients for any reason.

Investment Discretion

Discretionary Authority for Trading

VALUE VIEW FINANCIAL CORP. accepts discretionary authority to manage securities accounts on behalf of clients. VALUE VIEW FINANCIAL CORP. has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. VALUE VIEW FINANCIAL CORP. does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Typically, such discretionary authority is granted within constraints that are pre-arranged between client and advisor, such as restrictions on the type of assets to be traded, the use of margin, holding of long and/or short positions, and the type and nature of option contracts authorized. Clients may set any such restrictions on discretionary authority at the outset of the Agreement, and may amend such restrictions at any time.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

VALUE VIEW FINANCIAL CORP. does not typically vote proxies on securities. Clients are normally expected to vote their own proxies. Proxies, voting information, and other solicitations are normally received from the custodian where the shares are held.

When assistance on voting proxies is requested, VALUE VIEW FINANCIAL CORP. will provide recommendations to the Client or take action on the Client's behalf if requested. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

VALUE VIEW FINANCIAL CORP. does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because VALUE VIEW FINANCIAL CORP. does not serve as a custodian for client funds or securities, and does not require prepayment of fees in excess of the time allowed by regulatory authorities.

Business Continuity Plan

General

VALUE VIEW FINANCIAL CORP. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

VALUE VIEW FINANCIAL CORP. has a Business Continuation Agreement with another financial advisory firm to support VALUE VIEW FINANCIAL CORP. in the event of R. Scott Pearson's serious disability or death.

Information Security Program

Information Security

VALUE VIEW FINANCIAL CORP. maintains an information security program to reduce the risk that your personal and confidential information may be breached or otherwise compromised.

Privacy Notice

VALUE VIEW FINANCIAL CORP. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about transactions between you and third parties, and any additional information we may obtain in an effort to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and other financial professionals with whom you have established a relationship, but these only upon your specific request. Any information sharing authorizations you have provided may be ended upon your request. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. VALUE VIEW FINANCIAL CORP. strives to keep client information confidential and secure from prying eyes. VALUE VIEW FINANCIAL CORP. does not use any client passwords to access accounts and information not part of our fiduciary duty, and will not request you to share such information.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

Broker websites typically provide the highest possible data encryption security and are also password protected to prevent theft of client information.

If we experience or become aware of any cybersecurity breaches related to your personal information, or otherwise discover that your privacy has been compromised, we will inform you of this at the earliest possible moment.

Additional Information

State-Registered Advisors

Complete information regarding executive officers and management persons can be found in the Brochure Supplement (Part 2B of Form ADV).

No performance-based fees are utilized as stated in the section on

Performance-Based Fees.

Neither VALUE VIEW FINANCIAL CORP., nor any related persons have special relationships with any issuers of securities.

VALUE VIEW FINANCIAL CORP.
11546 68th St. N.
West Palm Beach, FL 33412
407-538-1881
www.valueview.net
frontdesk@valueview.net

Firm Brochure Supplement

(Part 2B of Form ADV)

3/30/2022

This brochure provides information about the qualifications and business practices of VALUE VIEW FINANCIAL CORP.. If you have any questions about the contents of this brochure, please contact us at: 877-622-9090, or by email at: FRONTDESK@VALUEVIEW.NET. 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 VALUE VIEW FINANCIAL CORP. is available on the SEC's website at www.adviserinfo.sec.gov.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

VALUE VIEW FINANCIAL CORP. requires that advisors in its employ have a degree of educational attainment demonstrating knowledge of investments and expertise in finance. Additionally, advisors have work experience that demonstrates their aptitude for investment management.

Richard Scott Pearson (CRD # 1276044)

- Date of Birth: August 27, 1961

Educational Background:

- B.A. Samford University, 1985
- M.B.A. University of South Florida, 1992
- M.A. The Ohio State University, 2004 (Economics)
- Ph.D. The Ohio State University, 2008

Relevant Business Experience:

- President and Chief Investment Officer
Value View Financial Corp. 1999 –present
- Associate Professor of Business, MBA Program Director,
Department Chair, Charleston Southern University, 2009-2017
- Director of the Alex. Brown Student Investment Program, and
Assistant Professor of Business, Washington College 2006 –2009
- Registered Investment Advisor, PCM, 1995 –1998
- Editor of Pearson Investment Letter 1990 –1998

Licensure and FINRA Exams:

Registered Investment Advisor in Florida, Ohio, and South Carolina
Series 2 - Non-Member General Securities Exam
Series 65 - Uniform Investment Advisor Law Examination

Disciplinary Information: There are no legal or disciplinary events to report

Other Business Activities and Additional Compensation: Dr. Pearson also is an associate professor of finance at Palm Beach Atlantic University, where he teaches courses in finance and related business topics.

Related to this role, he also conducts academic research, makes academic presentations, and develops online teaching materials and tools in his areas of expertise. Teaching courses in finance, economics, and related business topics, related administrative committee tasks, and research account for approximately 50% of his working hours.

Supervision:

Employees are supervised by R. Scott Pearson, President. He reviews work through frequent office interactions as well as remote interactions. He also reviews all activities through our client relationship management system as stated in our compliance manual.

R. Scott Pearson's contact information:

11546 68th St. N.,
West Palm Beach, Florida 33412
1-407-538-1881
spears@valueview.net

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None