



CLARK FINANCIAL

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Form ADV Part 2A Brochure

Clark Financial LLC is an investment adviser registered with the Texas State Securities Board. An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Clark Financial. If you have any questions about the contents of this brochure, please contact us at (972)896-9920 or jeffrey@clark-financial.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 Clark Financial is available on the SEC's website: www.adviserinfo.sec.gov.



Material Changes - Item 2

Revised: January 1, 2020

The purpose of this page is to inform you of any material changes since the previous version of this brochure.

We review and update our brochure at least annually to make sure that it remains current.



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Advisory Business - Item 4

Clark Financial LLC was founded in 2009 by Jeffrey Clark, who is the sole owner, and is based in Dallas, TX.

Advisory Services

Clark Financial LLC's ("Clark" or "the Advisor") principal service is providing fee-based investment advisory services and financial planning services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the client's objectives. The Advisor's primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The Advisor uses exchange listed securities, over-the-counter securities, corporate debt securities, municipal securities, mutual funds, United States government securities, and options in securities to accomplish this objective. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager's tenure, and/or overall career performance. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance. The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might adversely affect his/her investment plan or if he/she wishes to impose restrictions on investing in certain securities or types of securities.

Financial Planning

In addition to investment supervisory services, Clark may provide Financial Planning Services to some of its clients. The Advisor's Financial Planning services may include recommendations for portfolio customization based on their client's investment objectives, goals and financial situation. Financial Planning Services may also include recommendations relating to investment strategies as well as tailored investment advice.

As of December 31, 2020, Clark managed approximately \$105,000 of client assets on a discretionary basis.

Fees and Compensation - Item 5

Asset Management Fees

Pursuant to an investment advisory contract signed by each client, the client will pay Clark a quarterly Management Fee, payable in arrears, calculated daily, based on the amount of the assets managed by the Advisor as of the close of business on the last business day of each quarter. To calculate the fee, the client should follow this formula, Portfolio Value X (# of trading days in the quarter/ # of trading days in the year) X Annual % fee.

Non-Qualified Clients OR Qualified clients who opt-out of the performance fee:

\$0 – \$10,000 2.50 % per annum
\$10,001-\$50,000 2.00 %
\$50,001-\$100,000 1.75 %
\$100,001-\$250,000 1.50 %
\$250,001-\$1,000,000 1.25%
Over \$1,000,000 1.00%



Clients with Invested Assets Over \$1,000,000 or Qualified Clients plus performance fees (see disclosure in Item 6):

\$0-\$10,000	2.00%
\$10,001-\$50,000	1.50%
\$50,001-\$100,000	1.00%
\$100,001-\$250,000	0.75%
\$250,001-\$1,000,000	0.50%
Over \$1,000,000	0.25%

These fees may be negotiated by the Advisor, at the sole discretion of the Advisor.

Asset management fees will be automatically deducted from the client account on a quarterly basis by the custodian.

All fees paid to Clark for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses. A client could invest in these products directly, without the services of Clark. In that case, the client would not receive the services provided by Clark which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by Clark to fully understand the total fees to be paid.

Clark will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will Clark accept or maintain custody of a client's funds or securities. Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisors fee is separate and distinct from the custodian and execution fees.

Clients may request to terminate their advisory contract with Clark, in whole or in part, by providing advance written notice. Client's advisory agreement with the Advisor is non-transferable without Client's written approval.

Hourly fees

Some clients will contract to have investment advisory advice and/or financial planning advice provided based on an hourly fee rather than based on the assets under management. The Advisors hourly fee will be billed at a rate of \$100 per hour. The Advisors hourly fees will be negotiated and agreed upon by the parties in advance. Hourly fee-based clients are billed on a monthly basis upon completion of work performed.

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

In addition to the Management Fee, Clark may receive a Performance Fee based upon any gains obtained in the client's account for the calendar year. This fee will be equal to 20% of any gains in the client account during that period. The Performance Fee will be subject to a "high water mark" to ensure that Clark will not receive the Performance Fee unless, and only to the extent that, there are cumulative gains in the client's account during the calendar year. Performance fees will be calculated after the end of the calendar year and will be deducted automatically from the client's account at the same time as the fourth quarter Management Fee. Only "qualified clients" with either \$1 million under management or a net worth minus primary residence of \$1 million will have the option to be charged performance fees.

Performance based fee arrangements may create a conflict of interest since they create an incentive for Clark to



recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Clark has adopted policies requiring all advisory representatives to adhere to standard account management procedures regardless of the method of compensation received.

Types of Clients - Item 7

Clark generally provides investment advice to individuals.

Methods of Analysis, Investment Strategies and Risk of Loss - Item 8

The Advisor practices custom management of portfolios, on a discretionary basis, according to the client's objectives. The Advisor's primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The Advisor uses exchange listed securities, over-the-counter securities, corporate debt securities, municipal securities, mutual funds, United States government securities, and options in securities to accomplish this objective. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager's tenure, and/or overall career performance. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance.

The investment advice provided along with the strategies we suggest will vary depending on each client's specific financial situation and goals. **Investing in securities involves risk of loss that clients should be prepared to bear.**

This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed will be appropriate for you in light of your experience, objectives, financial resources, and other relevant circumstances.

General Investment Risk: All investments come with the risk of loss. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments you intend to invest in.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies.



Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned, and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Options Trading Risks: Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Disciplinary Information - Item 9

There are no legal or disciplinary events that are material to a *client's* or prospective *client's* evaluation of Clark.

Other Financial Industry Activities or Affiliations - Item 10

No one at Clark is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer, or as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

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

Clark maintains a code of ethics and they will provide a copy to any client or prospective client upon request.

Clark and/or its advisory representatives may from time to time purchase or sell products that they may recommend to clients. In such situations, the client's interests are considered first and at no time will the firm or its advisory representatives be permitted to trade ahead of client accounts. Clark strictly prohibits any trading



activity in its accounts or that of its advisory representatives which may be in contravention to the advice or recommendations given to clients. Supervisory Principals will routinely review firm and advisory representatives' trades to ensure compliance with these guidelines. More detail on these procedures is available in the firm's Code of Ethics.

Brokerage Practices - Item 12

The broker-dealer will be chosen based on the following: 1) the broker's capital depth, 2) the broker's market access, 3) the broker's transaction confirmation and account statement practices, 4) our knowledge of negotiated commission rates and spreads currently made available, 5) the nature and character of the markets for the security to be purchased or sold, 6) the desired timing of the transaction, 7) the execution, 8) clearance and settlement capabilities of the broker selected and others considered, 9) our knowledge of any actual or apparent operational problems of a broker and 10) the reasonableness of the commission or its equivalent for the specific transaction. Based on the above criteria, Clark may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker. This would justify higher commissions (or their equivalent) than other transactions requiring routine services.

Clark may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular client accounts. Prior to entry of a block trade, a written pre-allocation will be generated which identifies the group of client accounts participating in the order.

Clark has discretionary authority to select the broker or dealer for custodial and execution services. Clark will choose the broker/dealer to be used based on execution and custodial services offered, cost, quality of service and industry reputation. Although Clark has the ability to select the broker or dealer used: (1) Clark will not dictate commissions, and (2) Clark does not receive any type of product, service, compensation, or research from the chosen broker/dealer.

Review of Accounts - Item 13

Mr. Clark will review all accounts at least annually but may be reviewed more frequently during periods of unusual market activity. Accounts are re-balanced as needed based on account reviews, or in connection with additional deposits and withdrawals and re-optimized when deemed necessary by the advisor or sub-Advisor based on changes to client circumstances or in reaction to changes in market conditions and forecast. Re-balancing is accomplished by reallocating assets to original asset targets and re-optimizing involves setting new target asset category percentages.

Clients will receive statements directly from their account custodian(s) on at least a quarterly basis.



Client Referrals and Other Compensation - Item 14

Clark will not receive any economic benefit from, nor pay for, client referrals.

Custody - Item 15

Clark will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Clark accept or maintain custody of a client's funds or securities.

The client will receive written statements no less than quarterly from the trustee or custodian. In addition, the client will receive other supporting reports from Mutual Funds, Asset Managers, Trust Companies or Custodians, Insurance Companies, Broker/Dealers and others who are involved with client accounts.

Investment Discretion - Item 16

Clark generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by Clark.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Clark will be in accordance with each client's investment objectives and goals.

The primary objective in placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Clark will execute its transactions through an unaffiliated broker-dealer.

Voting Client Securities - Item 17

Clark will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, Clark cannot give any advice or take any action with respect to the voting of these proxies. The client and Clark agree to this by contract.

For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. Also, Clark cannot give any advice or take action with respect to the voting of these proxies.



Requirements of State-Registered Advisers - Item 19

Principal Executive Officers and Management Persons

Jeffrey D. Clark, President, was born in 1987, and attended Texas A&M University from 2005-2009. Mr. Clark graduated Cum Laude with a Bachelors degree in Business Administration with double majors in Finance and Management. Prior to school, Mr. Clark was employed as the Assistant to the Owner of Texas Stars Track Club in Dallas, TX from 2001-2005. Since 2009, Mr. Clark has been President and CCO of Clark Financial.

Outside Business Activities

No one at Clark is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer, or as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Performance Based Fees

Clark may receive a Performance Fee based upon any gains obtained in the client's account for the calendar year. Refer to, "Performance-Based Fees and Side-By-Side Management - Item 6" section of this brochure for further information about this topic.

Disciplinary Information

Jeffrey D. Clark, President, has not been involved in any reportable disciplinary events.

Other Relationships or Arrangements With Issuers of Securities

Our firm and our related persons do not have any relationships or arrangements with any issuer of securities.

Miscellaneous

Privacy Policy

Clark never discloses the nonpublic personal information collected about its clients to anyone except in furtherance of our business relationship, and then only to those persons necessary to effect the transactions and provide the services that clients authorize (such as broker-dealers, custodians, investment managers etc.) or as otherwise provided by law.