

FIRM BROCHURE

(Part 2A of Form ADV)

November 22, 2022



The CLEVER Group

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This brochure, Part 2A of Form ADV (the “Brochure”), provides information about the qualifications and business practices of The CLEVER Group, LLC. If you have any questions about the contents of this Brochure, please contact us at 985-713-2243 and/or info@theclevergroup.org.

The CLEVER Group, LLC is a Registered Investment Advisor with the State of Louisiana. Registration of an investment advisor does not imply any specific level of skill or training. This brochure provides information about The CLEVER Group to assist you in determining whether to retain the Advisor. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about The CLEVER Group and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

Item 1: Cover Page

Please refer to previous page.

Item 2: Material Changes

The CLEVER Group, LLC has no updates in its ADV Part 2A Disclosure Brochure to reflect any change(s):

Full Brochure Available

Whenever you would like to receive a complete copy of the brochure for The CLEVER Group, LLC (“the Registrant”, “The Firm”), please contact us by telephone at (985) 713-2243 or by email at info@theclevergroup.org.

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Item 4: Advisory Business

A. Description of Firm

The CLEVER Group, LLC, (“The CLEVER Group”, "we," "our," "us", or the “Firm”) is a South Louisiana-based Financial Planning firm founded and registered in 2021. CLEVER Group is currently registered with the State of Louisiana as a limited liability company. The CLEVER Group is 100% owned by Quintarius Queen who also serves as the Chief Compliance Officer (COO).

The CLEVER Group provides customized and comprehensive financial planning services to individuals, high net worth clients, trusts, estates, small businesses, charitable organizations, and pension/profit sharing plans. As discussed more fully below, The CLEVER Group assists clients in financial planning and consultation, determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

B. Types of Advisory Services Offered

The CLEVER Group provides two types of advisory services: Financial Planning Services are the primary services offered and Investment Management Services are offered as ancillary services. The Firm occasionally provides “Other Consulting” services as well as Educational Seminar services each on a case-by-case basis. Each of these services is described more fully below. All services are included in the annual fee paid by Clients, but the Client may decide to forego one or more services, as agreed upon in the advisory contract. Clients may also engage The CLEVER Group on an hourly (or otherwise limited) basis to provide advice on a specific topic or topics.

Before engaging The CLEVER Group to provide investment advisory services, Clients may be required to enter into an advisory contract with the Registrant setting forth the terms and conditions of the engagement (including termination), describing scope of services to be provided, and fees associated with the engagement.

Comprehensive services include regular meetings as well as reasonable availability of an advisor for financial consulting on investment or other financial matters by phone or personally, with the overall intention of offering Clients advice and assistance in all areas where finances play a role. Examples of services included in each category include:

1. Financial Planning Services

Financial Planning Services include the initial writing and formulation of a personal financial plan, with recommendations and supporting written work as necessary, and may include the ongoing tracking of the client's progress in achieving the personal financial goals targeted in the plan. The scope of Financial Planning Services selected is defined in advance and agreed upon between the Firm and the client. Fees for Financial Planning Services are defined below under Item 5: Fees and Compensation.

The Financial Planning Services process typically begins with the collection, organization, and assessment of relevant client data, including information concerning the client's lifestyle, risk tolerance, and cash flow, as well as identification of the client's financial concerns, goals, and objectives. The primary objective of this process is to allow the Firm to assist the client in developing a strategy for the successful management of income, assets, and liabilities in order to help meet the client's individual financial objectives. To help achieve this objective, The CLEVER Group may perform ongoing tracking of the client's progress in achieving his or her financial goals.

2. Investment Management Services

The CLEVER Group offers clients Investment Management Services that encompass the traditional asset classes of fixed income, domestic equities and foreign securities, but can also include alternative asset classes as well. The Firm is authorized, without prior consultation with Client, to provide, and to retain and/or direct one or more sub-advisors to provide, discretionary management services with respect to Client's Account such as; to buy, sell, and trade in stocks, bonds, mutual funds, and other securities and to give instructions in furtherance of such authority to the custodian of the Assets. The Firm shall have sole discretion to hire and fire any sub-advisors without client consent. The Firm will act, at all times, in a fiduciary capacity with respect to client's assets. The Firm will generally manage a client's investment portfolio on a discretionary basis and may assist the client in the establishment of the necessary custodial account(s) as set forth in the advisory contract. When exercising its discretionary authority, The CLEVER Group will make appropriate "buy, sell, hold" decisions as it believes they are needed using the Firm's asset allocation methodology.

The Firm's Investment Management Services typically begin through the gathering of information vis-à-vis a new Investment Policy Statement, or other similar documentation process. Depending upon the strategy selected by the Firm and the client, The CLEVER Group may invest client assets in various sectors and securities, including but not limited to: mutual funds, ETFs, stocks, bonds, treasuries, private funds and/or real estate investment trusts ("REITs"). Please refer to Item 8 for more information on The CLEVER Group's investment strategies, methods of analysis and their associated risks of loss.

4. Other Consulting Services

Other Consulting Services include financial advice and/or analysis of a specific client objective or situation, as defined and agreed on by the client and the Firm in advance. The specific objective or situation may be the evaluation of a specific venture or investment the client wants to consider, or it may be the evaluation of an advisory service offered by another professional organization. These consulting services can be for individuals or businesses.

The CLEVER Group also provides retirement plan consulting services to small businesses and other clients. These services may include advice on selection of plan managers and third-party administrators, providing ongoing consulting to the company's fiduciaries, assistance for employees with enrollment in the plan, and answering questions related to the available investments.

Note: If requested by the Client, Registrant may recommend the services of other professionals for implementation purposes in their individual licensed capacities. Client is under no obligation to engage the services of any recommended professional. Client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant.

5. Educational Seminars

From time to time, The CLEVER Group will occasionally offer educational workshops and seminar events to clients and their guests.

C. Tailored Services

Our advice and services are based on the individual needs of Clients, after analyzing and thoroughly evaluating their financial situation, goals, objectives, investment horizon, risk tolerance, tax considerations, liquidity needs, and any other issues important to the Client's state of affairs. Clients may impose restrictions on investing in certain asset classes by advising their investment advisor representative of such restrictions in writing.

D. Wrap-Fee Programs

The CLEVER Group is not a sponsor of, or participant in, any wrap fee program(s).

E. Assets Under Management

As of November 22, 2022, The CLEVER Group has \$0 in discretionary Assets Under Management, and \$0 in non-discretionary Assets Under Management.

Item 5: Fees and Compensation

A. Advisory Fees

Prior to engaging The CLEVER Group to provide advisory services, the client will be required to enter into a written Client Agreement with the Firm setting forth the terms and conditions and the fees under which it will render its services. Fees may be subject to negotiation under certain circumstances as agreed on by the Firm and the client. The following schedule of fees outlines the typical fee structure under which The CLEVER Group renders its services. The actual schedule of fees, as it applies to a particular client, will be clearly outlined in the Client Agreement.

When computing fees, assets under management (AUM) is used. AUM includes the value of all investment accounts for which the client receives continuous monitoring, development and revision of the investment management strategy, recommendations of investments, and assistance with implementation of the strategy. This includes custodial accounts as well as any held-away assets for which the client wishes to receive ongoing recommendations and monitoring, since they are part of the value being delivered. All investment accounts agreed upon in the advisory agreement are included in AUM for the purpose of computing fees which follow the following fee-schedule.

Assets Under Management	Advisory Fee (% AUM)
\$200,000 to \$500,000	1.45%
\$500,001 to \$750,000	1.25%
\$750,001 to \$1,000,000	1.10%
\$1,000,001 to 2,000,000	0.75%
In excess of \$2,000,000	Negotiable

Minimum fee — For Assets Under Management less than \$200,000 an annual minimum fee of \$1,500 applies (the “Minimum Fee”). The Minimum Fee will continue until Assets Under Management increases above \$200,000 at which time the Percentage of Managed Assets fee schedule above applies.

Investment Management Services fees are billed quarterly and prorated based on the number of days that an account is open during the quarter. The Firm can reduce or waive entirely its Investment Management Fee for client accounts, in the Firm’s sole discretion.

The annual fee is computed based on the total assets at the time the contract is signed (or the average value of the assets over the previous month, whichever is more advantageous to the client), and is generally constant for that year. If significant amounts are deposited/withdrawn from the account, then the annual fee may be revisited with the client, possibly resulting in an adjustment up or down to reflect the new amount being managed.

Example Investment Advisory Fee Breakdown:

# Of Days in Q4 (Oct. - Dec)	92
Annual Advisory Fee %	1.25%
Assets Under Management	\$ 600,000
Advisory Fee Calculated (for 92 Days)	\$ 1,890.41 (<u>Annual Advisory Fee % / 365 * 92</u>)

Total Advisory Fee Payable (rounded to nearest \$) \$ 1,890.00

3 Types of Fees for Financial Planning Services and Other Consulting Services

1. **Hourly Basis:** Hourly fees are charged at a rate of \$150.00 per planner-hour, including meeting time and preparation time (“Hourly Fee”). The first month's fees will be billed against an initial deposit, with the deposit amount agreed on in advance and set forth in the written agreement between the Client and the Firm.
2. **One-time/flat fee:** Clients pay a flat fee and make a deposit against the fee as agreed in advance and set forth in the written agreement between the Client and the Firm. The balance is due upon completion of Financial Planning Services.
3. **Fixed Annual Fee:** The CLEVER Group generally charges a fixed fee for its planning services. Annual fixed fees typically start at \$1,500 for broad-based planning service but can increase based on complexity of planning service. The annual fee is predicated upon the facts known at the start of the engagement and will be disclosed and agreed upon in advance of any service being performed. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments. Any additional services not included in the quoted services will be billed at The CLEVER Group's prevailing hourly rates or a new Financial Advisory Agreement will supersede the original agreement. All fluctuating fees or fees for additional services are discussed in the agreement.

The Registrant, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its annual minimum fee or asset level based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with Client, etc.).

Note: Fee Differentials. The Registrant shall price its services based upon various objective and subjective factors. As a result, the Registrant’s Clients could pay diverse fees based upon the market value of their assets, the complexity of the engagement, and the level and scope of the overall financial planning and/or consulting services to be rendered. The services to be provided by the Registrant to any particular Client could be available from other advisers at lower fees. All Clients and prospective clients should be guided accordingly.

B. Billing Method

The CLEVER Group's annual fees are generally paid quarterly in arrears, but may be paid monthly or annually as determined by the Client and set forth the advisory contract. Fees for the first billing period are prorated. The Registrant may bill Clients directly, in which case payment is due upon receipt of the Registrant's invoice. Alternatively, Clients may elect to have the Registrant's fees deducted from their custodial account or accounts to facilitate billing. The client must consent in advance to direct debiting of their investment account. Payment by check or ACH is also acceptable.

Both the Registrant's advisory contract and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of the Registrant's investment advisory fee and to directly remit that management fee to the Registrant in compliance with regulatory procedures.

C. Other Fees and Expenses

Clients will incur additional fees and expenses related to management of investments and advisory service provisions. These fees may include, but are not limited to no-load mutual fund ticket charges, brokerage transaction costs, deferred sales charges on previously purchased mutual funds, IRA maintenance fees and other legal or transfer fees. The broker-dealers, mutual fund companies, and other custodians who provide account services charge these fees ("third-party fees") and Clients are responsible for payment of all third-party fees and expenses. It is important to note that the advisory fees paid to The CLEVER Group are separate and distinct from the maintenance fees and transaction expenses charged by these third parties. Please refer to Item 12, Brokerage Practices for more information regarding account custodians.

D. Termination of Services / Refund Policy

Clients who do not receive this Brochure at least 48 hours in advance of signing our advisory contract are afforded the right to terminate their agreement within five (5) days, without penalty. Upon expiration of the five (5) day period, the advisory contract between the Registrant and the Client will continue in effect until terminated by either party by written notice in accordance with the terms of the advisory contract. Upon termination, the Client will be billed a prorated portion of the advisory fee based upon the number of days that services were provided during the billing period, as applicable.

E. Other Compensation

The CLEVER Group does not accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

F. Retainer Services Fee

Clients who elect this fee structure are subject to the following Monthly Breakdown of ongoing services in addition to services elected above and can expect to receive **quarterly review** reports and/or documentation outlining any updates or concerns regarding their financial plan:

	January	February	March	April	May	June
Plan Monitor	Review Client's Salary/Bonus, Retirement Contribution		Prepare Client's Tax Documents for CPA Review	Review Client's Prior Year's Tax / Contribution Info Before CPA Submission	Review Tax Return. Planning Opportunities, Withholdings, etc.	
Client Info		Client Provides December / January Pay Stubs And Account Statements			Client Forward Tax Return To The CLEVER Group	
Client Meeting		Review Q4 Investment Portfolio, If Needed				Meeting For Mid-Year Review, Update Financial Plan & Goals
Portfolio Mgmt.	Review Q4 Investment Portfolios			Review Q1 Investment Portfolios		

	July	August	September	October	November	December
Plan Monitor	No Client Expectations!					Review Client's Plan for Tax Opportunities, Prep for End of Year Review
Client Info			Client Provides Employer Benefits for Open Enrollment Review			
Client Meeting		Review Of Q2 Investment Portfolio, If Needed		Employer Benefits Discussion, If Needed		Meeting For End of Year Review & Tax Planning
Portfolio Mgmt.	Review Q2 Investment Portfolios		Review 401K Asset Allocation	Review Q3 Investment Portfolios		

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

The CLEVER Group does not charge performance-based fees and does not conduct side-by-side investment product management.

Item 7: Types of Clients

The CLEVER Group provides advisory services primarily to individuals and high net worth individuals, as well as to families, trusts, estates, pension and profit-sharing plans, charitable organizations, and other business entities. The CLEVER Group generally does not impose a minimum account size or minimum annual investment advisory fee for establishing a relationship.

Item 8: Methods of Analysis, Investment Strategies And Risk Of Loss

A. Methods of Analysis

The CLEVER Group may use either of two methods of analysis, fundamental or technical, in developing investment strategies, but will primarily employ technical analysis methods. The two methods are defined as:

- i. **Fundamental Analysis**: Security analysis grounded in basic factors such as company earnings, balance sheet variables, management quality and current vs. historical market valuations, which are used to predict the future value of an investment. Information such as interest rates, GDP, inflation, and unemployment may be used to predict the direction of the economy and therefore the stock market.
- ii. **Technical Analysis**: The practice of using statistics to determine trends in security prices and make or recommend investment decisions based on those trends. Technical analysis focuses on matters such as trade volume, demand, and volatility to help determine the market forces at work on a certain security or on the securities market as a whole.

B. Investment Strategies

Subject to our Clients' financial goals and suitability requirements, The CLEVER Group generally advises the long-term purchase of mutual funds to our Clients. Long-term purchases are typically defined as the purchase of securities held for at least one year. At times, The CLEVER Group may also buy and sell positions that are more short-term in nature (securities held less than one year) for the purpose of rebalancing a portfolio, meeting the cash needs or other goals of Clients, and/or the fundamentals of the security, sector or asset class. Clients may place reasonable restrictions on the strategies to be employed in their portfolio and the types of investments to be held in their portfolio.

The CLEVER Group may employ either strategic asset allocation (passive, long-term proportions of investments in a portfolio with occasional rebalancing) or tactical asset allocation (short-term adjustments to proportions of investments in consideration of current market conditions), but will typically recommend and employ a strategic asset allocation to best meet our Clients' investment goals. This strategic approach is employed utilizing the following principles:

- i. **Asset Allocation**: Apportioning a portfolio's assets to different asset classes, each of which has different levels of risk and return, with the goal of diversifying the portfolio. This is often done by setting target ratios for each asset class in the portfolio.
- ii. **Rebalancing**: Buying or selling positions to reallocate a portfolio to its target asset ratios.
- iii. **Cost minimization**: The CLEVER Group generally recommends and employs no-load mutual funds with small expense ratios in order to reduce the total costs of investing, which can have a significant impact on returns.
- iv. **Tax management**: We utilize several strategies to minimize taxes on investments. These strategies, among others, may include allocating investments with high taxable incomes to tax-deferred accounts, using tax-exempt investments, realizing taxable losses, and utilizing funds with low turnover rates and low capital gains distributions. We also attempt to limit the turnover of investments in client portfolios to minimize the realization of taxable capital gains.

C. Risk of Loss

Investing in securities involves a significant risk of loss, and all investments have certain risks that are borne by the investor. The CLEVER Group's methods of analysis and investment strategies aim to keep the risk of loss in mind. Some of risks of loss a client should be aware of include, but are not limited, to the following:

1. 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.
2. Market Risk: The price of a stock, bond, mutual fund or other security 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.
3. 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.
4. 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.
5. Political and Legislative Risks: Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the United States.
6. 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.
7. 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.
8. 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.

9. 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.

Item 9: Disciplinary Information

Neither The CLEVER Group nor its management has been involved in legal or disciplinary events related to advisory business.

Item 10: Other Financial Industry Activities and Affiliations

A. Financial Industry Activities

The CLEVER Group is not a registered broker-dealer and does not have an application pending for registration as a broker-dealer. Additionally, neither a member of the Registrant's management nor its investment advisor representatives are registered as, or have applications pending to register as, registered representatives (i.e., securities salesperson).

B. Financial Industry Affiliations

Neither The CLEVER Group's management nor investment advisor representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor nor has an application pending to register as the foregoing or associated persons thereof.

C. Other Affiliations

The CLEVER Group does not have arrangements with a related person that is a broker dealer, municipal securities dealer, government securities dealer or broker, investment company or other pooled investment vehicle (including mutual fund, closed-end investment company, unit investment trust, private investment company, or "hedge fund," and offshore fund), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, pension consultant, real estate broker or dealer, sponsor or syndicator of limited partnerships not already disclosed herein.

D. Other Investment Advisers

The Registrant does not select and recommend other investment advisors for our clients.

Item 11: Code of Ethics, Participation or Interest In Client Transactions And Personal Trading

A. Code of Ethics

The CLEVER Group has implemented a Code of Ethics that defines our fiduciary commitment and obligations to each Client. The Code of Ethics, which applies to the Registrant's management and all supervised persons, serves to establish a standard of business conduct that is based upon fundamental principles of transparency, honesty and good faith towards each Client. The Code of Ethics covers a range of topics that may include: general ethical principles, standards of business conduct, reporting and review of personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, and supervisory procedures. A copy of the Code of Ethics is available upon request.

B. Participation or Interest in Client Transactions

Neither the Registrant nor any related person of Registrant recommends, buys, or sells for client accounts, securities in which the Registrant or any related person of Registrant has a material financial interest.

C. Personal Trading

At times, The CLEVER Group and/or its associated persons may take positions in the same securities as clients, and may do so at or around the same time as those securities are recommended to clients. This may create a situation where the Registrant and/or its associated persons has a potential conflict of interest with Clients, which the Registrant must disclose to Clients and must mitigate through policies and procedures. In accordance with its fiduciary responsibilities to its clients, the Registrant and/or its associated persons will generally be "last in" and "last out" for any trading that may occur in securities that are not exempt from federal reporting – e.g. mutual funds and direct obligations of the U.S. Government. The Registrant has also, in accordance with Section 204A of the Investment Advisers Act of 1940, adopted written policies reasonably designed to prevent the misuse of material non-public information, which are maintained and enforced in order to detect scalping, front- running, and other potentially abusive practices by the Registrant and/or its associated persons.

Item 12: Brokerage Practices

A. Selection Criteria

The CCO is responsible for periodically conducting a formal review of the Firm's custodial relationships. The Firm's Oversight Committee is responsible for identifying and approving broker-dealers to use in executing trades for client accounts. The committee considers various factors in selecting a broker, including:

- Financial Condition;
- Acceptable record keeping;
- Ability to obtain best price;
- Knowledge of market, securities and industries;
- Commission structure; and
- Reputation and integrity.

B. Research and Other Soft Dollar Benefits

The Firm does not have any arrangements to receive soft dollar benefits in connection with client securities transactions.

C. Directed Brokerage

The Firm does not require clients to execute transactions through a specified broker-dealer. However, we generally recommend that investment management accounts be maintained at Shareholders Services Group, Inc (SSG). Clients should be aware that, in the event a client directs the brokerage to be used for transactions, the Firm may be limited in our ability to negotiate commissions, obtain volume discounts, or best execution in some transactions. Clients may pay higher transaction costs as a result of a broker-directed account by a client.

D. Aggregation of Orders

The CLEVER Group may aggregate ("block trade") sale and purchase orders with other client accounts that have similar orders being made at the same time under the management of the Firm, if in the Firm's judgment aggregation is reasonably likely to result in an overall economic benefit to the client. Such benefits may include better transaction prices and lower trade execution costs. If all aggregate orders do not fill at the same price, The CLEVER Group may cause the client and each similar order to pay or receive the average prices at which the orders were filled. If such orders cannot be fully executed under prevailing market conditions, The CLEVER Group may allocate the securities traded among clients and each similar order in a manner which it considers equitable, taking into account, the size of the order placed, the client's cash position, investment objective of the account, size of the order and liquidity of the security.

Item 13: Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by The CLEVER Group. Reviews are conducted by the Registrant's President and CCO, Mr. Queen. Formal reviews are conducted at least annually, or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the ongoing investment monitoring noted in Item 13.A., accounts may be reviewed as a result of major changes in economic conditions, material market or political events, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. All investment supervisory clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues, investment objectives and account performance with the Registrant on an annual basis.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account(s). The CLEVER Group may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14: Client Referrals and Other Compensation

In general, it is our policy that we do not pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. However, it is possible that in the future the Firm may enter into a referral arrangement.

If we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our Firm Disclosure Brochure) and a separate disclosure statement that includes the following information:

- the Solicitor's name and relationship with our Firm;
- the fact that the Solicitor is being paid a referral fee;
- the amount of the fee; and
- whether the fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

As a matter of Firm practice, the advisory fees paid to us by clients referred by solicitors are not increased as a result of any referral relationship. It is The CLEVER Group's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15: Custody

A. Custody of Securities

The CLEVER Group does not accept or maintain custody of any Client accounts or securities. All Clients must place their assets with a qualified custodian. Advisor is not affiliated with the custodian. The custodian does not supervise the advisor, its agents or activities. Clients are required to select their own custodian to retain their funds and securities and coordinate with The CLEVER Group to utilize that custodian for the Client's security transactions.

The Registrant has indirect custody of client funds and securities because of the authorization and ability to deduct advisory fees directly from Clients' accounts; nonetheless, the Registrant has implemented the safeguard requirements of state regulations by requiring safekeeping of Clients' funds and securities by a qualified custodian. Additionally, The CLEVER Group will send itemized advisory fee invoices for the covered billing period to Clients. The itemized invoice will include details regarding the amount of the advisory fee to be withdrawn, the value of the assets on which the fee is based, and the formula used to calculate the advisory fee.

B. Account Statements

Client account statements are mailed or sent electronically by the account custodian. Clients are advised to review account statements carefully, comparing asset values, holdings, and advisory fees on current statements to that in previously received confirmations and statements. Clients should note that the account custodian does not verify the accuracy of the Registrant's advisory fee calculation.

Item 16: Investment Discretion

A. Discretionary Authority; Limitations

The Firm is authorized, without prior consultation with Client, to provide, and to retain and/or direct one or more sub-advisors to provide, discretionary management services with respect to Client's Account such as; to buy, sell, and trade in stocks, bonds, mutual funds, and other securities and to give instructions in furtherance of such authority to the custodian of the Assets. The Firm shall have sole discretion to hire and fire any sub-advisors without client consent. The Firm will act, at all times, in a fiduciary capacity with respect to client's assets. The Firm will generally manage a client's investment portfolio on a discretionary basis and may assist the client in the establishment of the necessary custodial account(s) as set forth in the advisory contract. Such discretion is to be exercised in a manner consistent with each client's stated investment objectives, risk tolerance, and time horizon, as outlined in the client's Investment Policy Statement. In addition, The CLEVER Group's authority to trade securities may be limited in certain circumstances by applicable legal and regulatory requirements. Clients are permitted to impose reasonable limitations on The CLEVER Group's discretionary authority, including restrictions on investing in certain securities or types of securities. All such limitations, restrictions, and investment guidelines must be communicated to The CLEVER Group in writing.

Limited Power of Attorney

By signing The CLEVER Group's Client Agreement, clients authorize The CLEVER Group to exercise discretionary authority with respect to all Investment Management Service transactions involving the client's account (excluding any assets or accounts that are designated as "Unmanaged" per client direction). Pursuant to such agreement, The CLEVER Group is designated as the client's attorney-in-fact with discretionary authority to effect investment transactions in the client's account. This limited power of attorney authorizes the Firm to give instructions to third parties for servicing client's account. Clients should note that for all "Unmanaged" accounts or assets, the Firm will not exercise discretionary authority and, importantly, will not take responsibility for the suitability of these investments as they relate to the client's investment objectives.

Item 17: Voting Client Securities

The CLEVER Group's policy and practice is to not vote proxies on behalf of its clients and therefore, the Firm shall have no obligation to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held in a client's account, unless the account is an ERISA account and such authority has not been delegated to another named fiduciary in the plan's written documents. Consequently, clients retain the responsibility for receiving and voting all proxies for securities held within the client's account.

Item 18: Financial Information

A. Financial Condition

The CLEVER Group is unaware of any financial condition that is likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

B. Balance Sheet Requirement

The CLEVER Group does not require or solicit prepayment of more than \$1,200 in advisory fees per client, six (6) months or more in advance. Moreover, the Registrant does not meet any custody requirement that would require submitting its balance sheet.

C. Bankruptcy Petition Filings

The CLEVER Group has not been the subject of a bankruptcy petition.

Item 19: Requirements for State-Registered Advisers

A. Firm Management

The founder and President of The CLEVER Group is Quintarius Queen. Information regarding Mr. Queen's educational and business background is outlined his attached Brochure Supplement.

B. Other Business Activities

Quintarius Queen is also separately licensed as an independent insurance agent. In this capacity, Mr. Queen may effect transactions in insurance products for clients that have commissions associated with them. The fees you pay The CLEVER Group for advisory services are separate and distinct from the commissions received for the sale of insurance products.

C. Performance-Based Fees

The CLEVER Group does not assess performance-based fees. No employees of the Registrant receive performance-based compensation from advisory clients.

D. Disciplinary Disclosure Reporting

There are no legal, civil or disciplinary events to disclose regarding The CLEVER Group or Mr. Queen. Neither The CLEVER Group nor Mr. Queen has ever been involved in any regulatory, civil or criminal action. There are no arbitration claims, civil litigation, Self-Regulatory Organization proceedings, or administrative actions either pending or expected against The CLEVER Group or Mr. Queen.

E. Relationships or Arrangements with Securities Issuers

Neither The CLEVER Group nor its management has additional relationships or arrangements with any issuers of securities.

Item 20 Information Security Program

Information Security

The CLEVER Group maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Policy

The CLEVER Group, LLC strongly believes in protecting the confidentiality and security of information we collect about you. In this notice, "we" refers to The CLEVER Group, LLC and its employees. This notice describes our privacy policy and describes how we treat the information we receive ("Information") about you.

Why We Collect and How We Use Information: We collect and use Information for business purposes with respect to our relationships involving you. These business purposes include financial planning in all of its aspects, investment management, advising our clients, processing transactions requested by them, and income tax return preparation. We may also use Information to offer you other services we provide.

How We Collect Information: We get most Information directly from you. The Information that you give us when applying for our services generally provides the Information we need. Information collected may relate to your finances, employment, health, avocations or other personal characteristics as well as transactions with us or with others.

How We Protect Information: We treat Information in a confidential manner. Our employees are required to protect the confidentiality of Information. Employees may access Information only when there is an appropriate reason to do so, such as to administer or offer our services. We also maintain

physical, electronic and procedural safeguards to protect Information; these safeguards comply with all applicable laws. Employees are required to comply with our established policies.

Information Disclosure: We may disclose any Information when we believe it necessary for the conduct of our business, or where disclosure is required by law. For example, information may be disclosed to others to enable them to provide business services for us, such as performing general administrative activities for us, and assisting us in processing a transaction requested by you. Information may also be disclosed for audit or research purposes; or to law enforcement and regulatory agencies, for example, to help us prevent fraud. We do not make any other disclosures of Information to other companies who may want to sell their products or services to you. For example, we will not sell your name to a catalog company. If we wish to ask you for a reference, we will contact you and receive your prior permission each time.

Access to and Correction of Information: Upon your written request, we will make available Information for your review. If you notify us that the Information is incorrect, we will review and correct it.

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

FIRM BROCHURE SUPPLEMENT

(Part 2B of Form ADV)

November 22, 2022



The **CLEVER** Group

Quintarius Queen

279 Sanders Street
Thibodaux, LA 70301
985-713-2243
info@theclevergroup.org

This brochure, Part 2B of Form ADV (the “Brochure Supplement”), provides information about the qualifications and business practices of The CLEVER Group, LLC. If you have any questions about the contents of this Brochure, please contact us at 985-713-2243 and/or info@theclevergroup.org.

The CLEVER Group, LLC is a Registered Investment Advisor with the State of Louisiana. Registration of an investment advisor does not imply any specific level of skill or training. This brochure provides information about The CLEVER Group to assist you in determining whether to retain the Advisor. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about The CLEVER Group and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

Form ADV Part 2B

Item 1 – 2B Personnel Educational Background and Business Experience

Quintarius (Q) Queen

Year of Birth: 1997

Formal Education After High School:

- Louisiana State University, BS, Bachelor of Science
- Louisiana State University Shreveport, MBA, Master's of Business Administration

Business Background:

- The CLEVER Group, LLC, Founder, 2021 - Present;
- Investment Adviser Representative, 11/21 - Present
- Northwestern Mutual Investment Services, Registered Representative, 03/2022 – 11/2022

Licenses:

FINRA CRD # - 7122491

- Series 7, 11/2021
- Series 63, 12/2021
- Series 65, 12/2021

NIPR # - 799548

- Life, Health, and Accident Insurance, 01/2019 (Louisiana)

Certifications: Q does not have any certification but is actively pursuing the Certified Financial Planner (CFP®) Certification.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** - Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** - Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** - Complete 30 hours of continuing education hours every two years including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** - Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® Certification.

Item 2 – 2B Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Queen has no required disclosures under this item.

Item 3 – 2B Other Business Activities

Quintarius Queen is also separately licensed as an independent insurance agent. In this capacity, Mr. Queen may effect transactions in insurance products for clients that have commissions associated with them. The fees you pay The CLEVER Group for advisory services are separate and distinct from the commissions received for the sale of insurance products.

Item 4 – 2B Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Queen's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Fees and Compensation, Client Referrals and Other Compensation and Other Financial Industry Activities and Affiliations* section(s) of The CLEVER Group's firm brochure for additional disclosures on this topic.

Item 5 – 2B Supervision

As the Founder of The CLEVER Group, Quintarius Queen supervises the advisory activities of our firm. Q can be reached at (985) 713-2243.

Item 6 – 2B Requirements for State-Registered Advisers

This disclosure is required by Louisiana securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

A. Mr. Queen has NOT been involved in any of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following: (i) an investment or an investment-related business or activity; (ii) fraud, false statement(s), or omissions; (iii) theft, embezzlement, or other wrongful taking of property; (iv) bribery, forgery, counterfeiting, or extortion; or (v) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following: (i) an investment or an investment-related business or activity; (ii) fraud, false statement(s), or omissions; (iii) theft, embezzlement, or other wrongful taking of property; (iv) bribery, forgery, counterfeiting, or extortion; or (v) dishonest, unfair, or unethical practices.

B. Mr. Queen has NOT been the subject of a bankruptcy petition in the past ten years.