

# Christian Wealth Management, LLC

2419 Caron Lane  
Falls Church, VA 22043

TELEPHONE: 703-560-5625  
FACSIMILE: 703-560-2334

EMAIL: [carl@cwmcep.com](mailto:carl@cwmcep.com)  
WEBSITE: [www.cwmcep.com](http://www.cwmcep.com)

Form ADV Part 2A  
Disclosure Brochure

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This brochure provides information about the qualifications and business practices of Christian Wealth Management, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at: 703-560-5625, or by email at: [carl@cwmcep.com](mailto:carl@cwmcep.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 Christian Wealth Management, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated February 11, 2020, there are no material changes to report.

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## Item 4 Advisory Business

### Firm Description

Christian Wealth Management, LLC, ("CWM") was founded in 2008. Carl G. Balestrieri is 100% owner along with his wife Rena Balestrieri. Mr. Balestrieri is the sole investment adviser representative of CWM. Mrs. Balestrieri provides no advisory services and is merely a passive owner of CWM.

CWM provides personalized confidential financial planning and refers individuals to third party money managers for ongoing management of their portfolio. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

CWM is a fee based financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm's Managing Member is affiliated with entities that sell insurance products.

Investment advice is an integral part of financial planning. In addition, CWM advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis.

### Types of Advisory Services

CWM furnishes financial planning and investment advice through consultations.

On more than an occasional basis, CWM furnishes advice to clients on matters not involving securities, such as taxation issues and trust services that often include estate planning.

### FINANCIAL PLANNING AND REVIEW

If financial planning services are applicable, the client may choose to compensate CWM on an hourly or a negotiable fixed fee basis described in detail under "Fees and Compensation" section of this brochure. Financial plans will be completed and delivered inside of 90 days.

The details of the financial planning services provided are as follows:

Financial planning areas include, but are not limited to: review of the client's current situation, review of the client's current documents, financial planning, retirement planning, income planning, distribution planning, estate planning, insurance planning, college funding, asset allocation, IRA strategies, tax reduction strategies, and electronic account aggregation programs. These services are provided as requested on a la carte basis and are priced accordingly based upon an hourly rate or a negotiable fixed fee.

The financial plans are delivered in person by the financial advisor and reviewed in detail with the client. The Financial Planning Binder becomes the client's property upon the completion of the delivery meeting. It is recommended that the client bring the planning binder to all follow-up meetings with the financial advisor.

## SELECTION OF OTHER ADVISERS

CWM refers clients to Third Party Money Managers for ongoing management for certain financial industry affiliated client accounts. In such circumstances, CWM shares in the fees charged by the Third Party Manager. Please see Item 10 *Other Financial Industry Activities and Affiliations* below for more details.

### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

### **Wrap Fee Programs**

CWM does not participate in wrap fee programs.

### **Client Assets Under Management**

CWM does not generally manage clients' money directly, but refers clients to third party money managers and shares in the fees charged by such third party money managers. However, we do manage two accounts on a discretionary basis over which we have custody. The total of these assets under management are \$1,044,598 as of December 31, 2020. We have no non-discretionary assets under management.

## **Item 5 Fees and Compensation**

### **Method of Compensation and Fee Schedule**

CWM bases its fees on fixed fees (not including subscription fees) and fees from third party money managers.

## FINANCIAL PLANNING AND REVIEW

Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. Client may cancel at any time during the ninety (90) days with no cost or obligation. Services are completed and delivered inside of ninety (90) days. Client receives an invoice payable to CWM following 90-day plan completion for financial planning services.

Fees for financial plans are due upon plan completion unless otherwise agreed to in writing by the parties. The fees are negotiable based on the client's personal situation, assets, and objectives. Prior to the planning process the client is provided an estimated plan fee.

### FIXED FEES

Fixed Fee billing is primarily used for clients needing or wanting Financial Planning Services based upon a one-time flat fee of a fixed amount in the range of \$250 - \$2,500. Clients may engage CWM to prepare and complete comprehensive financial planning documents as noted in the Financial Planning Services section. These services are optional and provided at the client's request.

### HOURLY FEES

Financial Planning Services are offered based on an hourly fee of \$300 per hour. The client's profile and goals sheet is used to determine a financial plan of the client. Financial planning includes but is not limited to Estate Planning, Risk Management, Tax Planning, Portfolio Risk Management and IRA Beneficiary Analysis.

### FEES FOR SELECTION OF OTHER ADVISERS

CWM has entered into an agreement with a Third Party Money Manager, Ashton Royce & Co. ("ARCO"). CWM and ARCO are not affiliated. ARCO provides investment portfolio advice and supervisory services for certain financial industry affiliated clients.

The relationships between CWM and the ARCO will be disclosed to the client in writing prior to commencement of the services. Clients must enter into an agreement directly with ARCO.

Advisory fees charged by ARCO are separate and apart from our advisory fees. Assets managed by ARCO will be included in calculating our advisory fee. The amount we charge as our advisory fee is negotiable and based on the amount of assets we manage according to the schedule below:

**CWM Annual Fee Table**

First \$1,000,000	1.50%
Next \$1,000,000	1.25%
Next \$1,000,000	1.00%
Over \$3,000,000	0.75%

For additional details about the CWM's financial industry affiliated clients please see Item 10 *Other Financial Industry Activities and Affiliations* of this brochure.

### **ARCO**

Ashton Royce & Co. receives a fee of annual fee 0.49% is billed quarterly in advance and based on the average daily net assets of each series of the Ashton Royce Fund. Advisory fees that you pay to ARCO are established and payable in accordance with the brochure provided by ARCO. These fees may or may not be negotiable. You should review ARCO's brochure and take into consideration fees they charge along with our fees to determine the total amount of fees associated with this program. ARCO instructs the custodian to deduct the total fee and will send concurrent fee notices to you on our behalf.

You may terminate your advisory relationship with ARCO according to the terms of your agreement with the ARCO. You should review each ARCO's brochure for specific information on how you may terminate your advisory relationship with ARCO and how you may receive a refund, if applicable. You should contact ARCO directly for questions regarding your advisory agreement with ARCO.

You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees you will receive a prorated refund of those fees paid but unearned at the time of termination.

### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

CWM, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

### **Prepayment of Client Fees**

CWM does not charge client fees in advance.

### **External Compensation for the Sale of Securities to Clients**

CWM does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of CWM.

## **Item 6 Performance-Based Fees**

### **Sharing of Capital Gains**

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

CWM does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## **Item 7 Types of Clients**

### **Description**

CWM generally provides investment advice to individuals and certain financial industry affiliated clients. Please see Item 10 *Other Financial Industry Activities and Affiliations* for additional information.

Client relationships vary in scope and length of service.

### **Account Minimums**

CWM does not require a minimum to open an account. Some Third Party Money Managers utilized by CWM might have minimums to open accounts on their platform.

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

### **Methods of Analysis, Investment Strategies and Risk of Loss**

#### **\*CWM does not offer portfolio management services to new clients\***

ARCO may use the following Methods of Analysis or Investment Strategies when managing financial industry affiliated accounts.

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth.

Technical analysis involves evaluating securities based on past prices and volume.

Cyclical analysis involves analyzing the cycles of the market.



The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Please refer to the ARCO's brochure for additional information on their Methods of Analysis, Investment Strategies and Risk of Loss.

### **Investment Strategy and Method of Analysis Material Risks**

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 an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

### **Security Specific Material Risks**

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 buy more than 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.

## Item 9 Disciplinary Information

On August 6, 2008, C.G.B. Marketing, Inc. (Christian Estate Planning, Inc.) and Carl Balestrieri agreed to a Settlement Order with the Commonwealth of Virginia SCC paying a \$1,000 Monetary penalty and \$500 to defray the cost of the investigation concerning 13.1-504 A(ii) of the Virginia Securities Act. On August 26, 2008, Christian Wealth Management, LLC voluntarily accepted an Order Imposing Special Supervisory Procedures. "In agreeing to this settlement order C.G.B. Marketing, Inc. (Christian Estate Planning, Inc.) and Carl Balestrieri neither admit nor deny the allegations but admits to the Commission's jurisdiction and the authority to enter this settlement order."

Based on an investigation conducted by the Bureau of Insurance of the Commonwealth of Virginia, the State Corporation Commission alleged on 09/26/2012 that Carl Balestrieri violated sections 38.2-502, 38.2-503, 38.2-509, 38.2-512, and 38.2-1838 of the Code of Virginia ("Code"). Without admitting any violation of Virginia law, Carl Balestrieri accepted an offer of settlement with the Commission on November 2, 2012 wherein he tendered to the Commonwealth the sum of Two Thousand Dollars (\$2,000).

On April 13, 2016, Christian Wealth Management, LLC, and Carl Balestrieri ("Defendants") entered into a Settlement Order with the State Corporation Commission. The Division alleged Defendants violated (i) § 13.1-503 B of the Act making untrue statements of a material fact, or omitting to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading through the materials provided to prospective clients as well as through Christian Wealth's website and Form ADV; (ii) § 13.1-516 of the Act by willfully making or causing to be made, in Christian Wealth's Form ADV filed with the Commission statements about fees which were, at the time and in the light of the circumstances in which they made, false or misleading; (iii) 21 VAC 5-80-200 A (8) of the Commission's Rules governing Investment Advisors, 21 VAC 5-80-10 et seq. ("Rules") by misrepresenting to advisory clients or prospective advisory clients, on Christian Wealth's website and its Form ADV, Balestrieri's qualifications, and misrepresenting fees to be charged for the services; and (iv) Rule 21 VAC 5-80-200 A (16) by failing to provide an investment advisory contract for a client that was in writing and discloses the required information.

To settle this matter the Defendants admitted violating § 13.1-516 of the Act, paid a monetary penalty in the amount of \$50,000, paid \$10,000 to defray the costs of investigation but neither admit nor deny the remaining allegations and agreed to not violate the Act in the future.

## Item 10 Other Financial Industry Activities and Affiliations

### Broker-Dealer or Representative Registration

CWM has no employees that are registered representatives of a broker dealer.

### Futures or Commodity Registration

Neither CWM nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

### Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing Member Carl Balestrieri has a financial industry affiliated business as a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Mr. Balestrieri receives commissions from insurance companies on the products he sells. Greater than 50% of Mr. Balestrieri's time is spent in this practice.

These practices represent conflicts of interest because it gives Carl Balestrieri an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by the fact that Mr. Balestrieri has a fiduciary responsibility to place the best interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products/services through another insurance agent of their choosing.

### **Recommendation of Other Advisers for Financial Industry Affiliations**

We may recommend that you use a third party money manager ("TPMM") ("ARCO") based on your needs and suitability. We will receive compensation from ARCO for recommending that you use their services. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of the third party adviser. You are not obligated, contractually or otherwise, to use the services of any TPMM we recommend. Refer to the *Advisory Business* section above for additional disclosures on this topic.

The relationship between CWM and ARCO will be disclosed to the client in writing prior to commencement of the services. CWM will provide each client a disclosure document containing the following information:

- The name of the assisting investment advisor representative;
- The name of the other investment advisor;
- The nature of the relationship, including any affiliation between the assisting advisor representative and the other investment advisor;
- A statement that the assisting investment advisor representative will be compensated for his service by the other investment advisor;
- The terms of such compensation arrangement, including a description of the compensation paid to the assisting investment advisor representative; and
- Compensation differentials charged to clients above the normal other investment advisor's fee, as a result of the cost of obtaining clients by compensating the assisting investment advisor representative.

Client's signature is required to confirm consent for services within ARCO. Client will initial CWM's Investment Advisory Agreement to acknowledge receipt of ARCO's Fee Schedule and required documents including ADV Part 2 disclosures.

These practices represent conflicts of interest because CWM shares in the fees paid to ARCO. This conflict is mitigated by the fact that clients are not required to place their business with the advisors recommended or selected by Mr. Balestrieri. Clients have the option to received investment advice through other money managers of their choosing.

We also have other financial industry affiliations that have business relationships with ARCO that include

Mr. Balestrieri has formed a not for profit tax exempt charity, Christians Giving Back, Inc., and serves as the Chairman of the Board / Treasurer. CWM serves as the investment adviser for the charity and manages the charity's assets. In addition, Mr. Balestrieri is the Trustee of The Donald O Christiana Trust. Consequently, these affiliations gives Mr. Balestrieri custody and discretionary authority over the charity and trust assets. The funds and securities of the charity and trust will be held with a bank, broker-dealer, or other independent, qualified custodian. Clients of CWM are not solicited to donate to the charity. This situation creates a conflict of interest. However, when referring these clients to ARCO, the client's best interest will be the main determining factor of CWM. **\*We do not offer this service to new clients\***

Prsuant to Virginia Securities Act Rule 21 VAC 5-80-190E, we hereby inform you that the following information will be provided separately:

1. The name of the assisting investment advisor representative;
2. The name of the other investment advisor;
3. The nature of the relationship, including any affiliation between the assisting investment advisor representative and the other investment advisor;
4. A statement that the assisting investment advisor representative will be compensated for his services by the other investment advisor;
5. The terms of such compensation arrangement, including a description of the compensation paid to the assisting investment advisor representative;
6. Compensation differentials charged to clients above the normal other investment advisor's fee, as a result of the cost of obtaining clients by compensating the assisting investment advisor representative.

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

### **Code of Ethics Description**

The employees of CWM have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of CWM employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of CWM. The Code reflects CWM and its supervised persons' responsibility to act in the best interest of their client.

One area in which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

CWM's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of CWM may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

CWM's Code of Ethics is based on the guiding principle that the interests of the client are our top priority. CWM's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When the potential for conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code of Ethics applies to "access" persons. "Access" persons are employees *who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.*

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

## **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

CWM and its employees do not recommend to clients securities in which we have a material financial interest.

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

CWM and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as trading away of client trades, employees are required to disclose all reportable securities transactions as well as provide CWM with copies of their brokerage statements. The Chief Compliance Officer of CWM is Carl Balestrieri. He reviews all employee trades each quarter. The personal trading reviews helps mitigate that the personal trading of employees does not affect the markets and that clients of the firm have received preferential treatment over employee trades.

## **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

CWM does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

## **Item 12 Brokerage Practices**

### **Factors Used to Select Broker-Dealers for Client Transactions**

CWM does not have any affiliation with product sales firms and does not recommend brokers. Brokers will be recommended by the third party money manager being used.

- *Directed Brokerage*

CWM utilized Third Party Money Managers and therefore it does not take direction from clients as to what broker-dealer to use.

- *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. CWM does not have discretionary authority and therefore best execution is not applicable.

- *Soft Dollar Arrangements*

CWM does not maintain any soft dollar arrangements.

### **Aggregating Securities Transactions for Client Accounts**

CWM does not trade for its or its client's accounts and therefore aggregation of securities transactions is not applicable.

## **Item 13 Review of Accounts**

### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Carl Balestrieri reviews the Third Party Money Manager statements of the clients he referred at least quarterly. Financial Plans are considered complete when recommendations are delivered to the client and a review is done only upon request of client.

### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of client's accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

### **Content of Client Provided Reports and Frequency**

Clients receive account statements no less than quarterly from for managed accounts. Account statements are issued by the Third Party Money Manager's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

## **Item 14 Client Referrals and Other Compensation**

### **Economic benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

CWM shares in the fees charged by third party money managers to whom CWM refers clients.

### **Advisory Firm Payments for Client Referrals**

CWM does not compensate for client referrals.

## **Item 15 Custody**

### **Trustee Services**

Mr. Balestrieri has formed a not for profit tax exempt charity, Christians Giving Back, Inc., and serves as the Chairman of the Board. CWM serves as the investment adviser for the charity and manages the charity's assets. In addition, Mr. Balestrieri is the Trustee of The Donald O Christiana Trust. Consequently, these affiliations gives CWM custody and discretionary authority over the charity and trust assets. The funds and securities of the charity and trust will be held with a bank, broker-dealer, or other independent, qualified custodian, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by the ARCO.

Advisory fees charged by ARCO are separate and apart from our advisory fees. Assets managed by ARCO will be included in calculating our advisory fee. The amount we charge as our advisory fee is negotiable and based on the amount of assets we manage. ARCO receives a fee of annual fee which is billed quarterly in advance and based on the average daily net assets of each series of the Ashton Royce Fund. ARCO instructs the custodian to deduct the total fee and will send concurrent fee notices to you on our behalf.

## **Item 16 Investment Discretion**

### **Discretionary Authority for Trading**

CWM does not offer portfolio management services or have discretionary authority to manage securities accounts on behalf of clients.

As previously mentioned, CWM does have certain financial industry affiliations for which Carl Balestrieri is either the trustee or Chairman of the Board / Treasurer. Due to Mr. Balestrieri's capacities with these affiliations and also an investment adviser representative of CWM, it is determined that CWM has custody and the discretionary authority to hire and fire the TPMM. Please see Item 15 *Custody* for additional information.



## Item 17 Voting Client Securities

### Proxy Votes

CWM does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

## Item 18 Financial Information

### Balance Sheet

A balance sheet is not required to be provided because CWM does not serve as a custodian for client funds or securities and CWM does not require prepayment of fees of more than \$500 per client and six (6) months or more in advance.

### Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

CWM has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### Bankruptcy Petitions during the Past Ten Years

Neither CWM nor its management has had any bankruptcy petitions in the last ten years.

## Item 19 Requirements for State Registered Advisors

Refer to the Part(s) 2B for background information about management personnel and those giving advice on behalf of our firm.

Our firm is not actively engaged in any business other than giving investment advice.

Neither our firm, nor any persons associated with our firm are compensated for advisory services with performance-based fees. Please refer to the "Performance-Based Fees and Side-By-Side Management" section above for additional information on this topic.

Other than as disclosed above in Item 9, neither our firm, nor any of our management persons have any reportable arbitration claims, civil, self-regulatory organization proceedings nor any other administrative proceedings.

Neither our firm, nor any of our management persons have a material relationship or arrangement with any issuer of securities.

## Item 20 Additional Information

### Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

**Trade Errors**

CWM does not trade for its or its client's accounts and therefore this section is not applicable.

**Class Action Lawsuits**

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.



**Carl Balestrieri**

**Christian Wealth Management, LLC**

2419 Caron Lane  
Falls Church, VA 22043

**Telephone: 703-560-5625**

**Facsimile: 703-560-2334**

**January 15, 2021**

**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Carl Balestrieri that supplements the Christian Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact us at 703-560-5625 if you did not receive Christian Wealth Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Carl Balestrieri is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational Background and Business Experience

### Carl Balestrieri

#### Educational Background:

- Date of birth: 04/01/1957
- James Madison University; BBA, Management and Marketing; 1979

#### Business Experience:

- Christian Wealth Management, LLC; Managing Member/IAR; 02/2008 - Present
- Christian Estate Planning, Inc. f/k/a CGB Marketing, Inc.; President/Insurance Agent; 04/2008 - Present
- CGB Marketing, Inc.; President/Insurance Agent; 09/2004 - 04/2008

## Item 3 Disciplinary Information

On August 6, 2008, C.G.B. Marketing, Inc. (Christian Estate Planning, Inc.) and Carl Balestrieri agreed to a Settlement Order with the Commonwealth of Virginia SCC paying a \$1,000 Monetary penalty and \$500 to defray the cost of the investigation concerning 13.1-504 A(ii) of the Virginia Securities Act. On August 26, 2008, Christian Wealth Management, LLC voluntarily accepted an Order Imposing Special Supervisory Procedures. "In agreeing to this settlement order C.G.B. Marketing, Inc. (Christian Estate Planning, Inc.) and Carl Balestrieri neither admit nor deny the allegations but admits to the Commission's jurisdiction and the authority to enter this settlement order."

Based on an investigation conducted by the Bureau of Insurance of the Commonwealth of Virginia, the State Corporation Commission alleged on 09/26/2012 that Carl Balestrieri violated sections 38.2-502, 38.2-503, 38.2-509, 38.2-512, and 38.2-1838 of the Code of Virginia ("Code"). Without admitting any violation of Virginia law, Carl Balestrieri accepted an offer of settlement with the Commission on November 2, 2012 wherein he tendered to the Commonwealth the sum of Two Thousand Dollars (\$2,000).

On April 13, 2016, Christian Wealth Management, LLC, and Carl Balestrieri ("Defendants") entered into a Settlement Order with the State Corporation Commission. The Division alleged Defendants violated (i) § 13.1-503 B of the Act making untrue statements of a material fact, or omitting to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading through the materials provided to prospective clients as well as through Christian Wealth's website and Form ADV; (ii) § 13.1-516 of the Act by willfully making or causing to be made, in Christian Wealth's Form ADV filed with the Commission statements about fees which were, at the time and in the light of the circumstances in which they made, false or misleading; (iii) 21 VAC 5-80-200 A (8) of the Commission's Rules governing Investment Advisors, 21 VAC 5-80-10 et seq. ("Rules") by misrepresenting to advisory clients or prospective advisory clients, on Christian Wealth's website and its Form ADV, Balestrieri's qualifications, and misrepresenting fees to be charged for the services; and (iv) Rule 21 VAC 5-80-200 A (16) by failing to provide an investment advisory contract for a client that was in writing and discloses the required information.

To settle this matter the Defendants admitted violating § 13.1-516 of the Act, paid a monetary penalty in the amount of \$50,000, paid \$10,000 to defray the costs of investigation but neither admit nor deny the remaining allegations and agreed to not violate the Act in the future.

## Item 4 Other Business Activities

Carl Balestrieri is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Balestrieri for insurance related activities. This presents a conflict of interest because Mr. Balestrieri may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, Mr. Balestrieri has a fiduciary responsibility to place the best interest of the client first and you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm. Mr. Balestrieri spends over 50% of his time in this activity.

Mr. Balestrieri has formed a not for profit tax exempt charity, Christians Giving Back, Inc., and serves as the Chairman of the Board / Treasurer. CWM serves as the investment adviser for the charity and manages the charity's assets. In addition, Mr. Balestrieri is the Trustee of The Donald O Christiana Trust. Consequently, these affiliations gives Mr. Balestrieri custody and discretionary authority over the charity and trust assets. The funds and securities of the charity and trust will be held with a bank, broker-dealer, or other independent, qualified custodian. Clients of CWM are not solicited to donate to the charity. This situation creates a conflict of interest. However, when referring these clients to a third party money manager, the client's best interest will be the main determining factor of CWM. **\*We do not offer this service to new clients\***

## Item 5 Additional Compensation

Please refer to the *Other Business Activities* section above for disclosures on Mr. Balestrieri's receipt of additional compensation as a result of his activities as a registered a licensed insurance agent.

Also, please refer to the *Fees and Compensation* section and the *Client Referrals and Other Compensation* section of Christian Wealth Management, LLC's firm brochure for additional disclosures on this topic.

## Item 6 Supervision

Mr. Balestrieri is the sole owner of Christian Wealth Management, LLC and therefore he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients.

## Item 7 Requirements for State Registered Advisers

Carl Balestrieri does not have, nor has ever had, any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization proceeding and has not been the subject of a bankruptcy petition. Other than as disclosed above in Item 3, Mr. Balestrieri has not been found liable in any other reportable administrative proceeding.