

**Introduction**

Our firm, Vista Finance, LLC, is an investment adviser registered with the Securities and Exchange Commission. We feel that it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. There are free and simple tools available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We are a registered investment adviser that offers investment advisory services, including Wrap Comprehensive Portfolio Management (“Wrap CPM”), Portfolio Monitoring and Financial Planning & Consulting to clients. If you open an advisory account with our firm, we will meet with you to understand your current financial situation, existing resources, objectives, and risk tolerance. Based on what we learn, we will recommend a portfolio of investments that is monitored at least annually, and if necessary, rebalanced to meet your changing needs and goals. We will offer you advice on a regular basis and contact you at least annually to discuss your portfolio.

You can select whether we can buy and sell investments in your account without asking you in advance (“discretion”) or only after receiving your permission (“non-discretion”). If you select non-discretion, you make the ultimate decision regarding the purchase or sale of investments. Any limitations will be described in the signed advisory agreement. We will have discretion or non-discretion until the advisory agreement is terminated by you or our firm.

Our firm charges a minimum annual fee for our Wrap CPM service and our Portfolio Monitoring service. Respectively, the Wrap CPM fee is \$15,000 and the Portfolio Monitoring service is \$5,000. We provide non-continuous and periodic outside account/position monitoring for Portfolio Monitoring services. However, this service is solely consultative in nature and does not include ongoing supervision, trading, or discretion.

Financial Planning & Consulting is included in our Wrap CPM services for no additional fee. Financial Planning & Consulting is also offered as a separate service for a flat or recurring fee. We do not monitor your investments for the Financial Planning & Consulting service.

Additional information about our advisory services is in Item 4 of our Firm Brochure and Item 5 of our Wrap Fee Program Brochure, which are available online at <https://adviserinfo.sec.gov/firm/summary/312082>.

Questions to Ask Us: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do those qualifications mean?

What fees will I pay?

You will be charged an ongoing annual fee applied monthly based on the value of the assets in your account. Our maximum annual fee for Wrap CPM is 1.25%. Our maximum annual fee for Portfolio Monitoring is 0.75%. The more assets you have in your advisory account, the more you will pay us. We therefore have an incentive to increase the assets in your advisory account to increase our fees. Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account. Our firm’s fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account. In rare cases, we will agree to send you invoices rather than automatically deduct our fees from your advisory account.

Our maximum flat and annual recurring fee for standalone Financial Planning & Consulting services is \$100,000. The specific fee-paying arrangements will be detailed in the signed consulting agreement. We pay the custodian’s transaction fees charged to you for our Wrap CPM service. The fees for wrap fee programs are therefore higher than a typical asset-based advisory fee. You may also pay charges imposed by the custodian holding your accounts for certain investments and maintaining your account. Some investments, such as mutual funds, index funds, exchange traded funds, and variable annuities, charge additional fees that will reduce the value of your investments over time. In addition, you may have to pay fees such as “surrender charges” to sell variable annuities. We may also recommend the use of alternative investment funds, which charge additional management fees and performance-based fees. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Additional information about our fees is in Item 5 of our Firm Brochure and Item 4 of our Wrap Fee Program Brochure, which are available online at <https://adviserinfo.sec.gov/firm/summary/312082>.

Questions to Ask Us: Help me understand how these fees and costs may affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means:

Our firm has an ownership interest in Vista Insurance Advisors, an affiliated insurance agency. Clients may be solicited to use the services of this firm and our firm and representatives will receive commissions as a result of these transactions. A conflict of interest exists as these commissionable sales create an incentive to recommend products based on the compensation earned. To mitigate this potential conflict, our firm will act in the client's best interest.

Our firm also has an ownership interest in Vista Registered Agent Services, a company through which some of our employees also act as registered agent for individuals and entities. Services include the initial formation/filing of entities as well as annual renewal filings. This is a separate business from our advisory services.

For our wrap service, we pay the custodian's transaction fees charged to you except for U.S. listed equities and exchange traded funds, which do not have transaction fees. As a result, we have an incentive to recommend these asset types without transaction fees in order to reduce the amount of the custodian's transaction fees that we will have to pay on your behalf.

Related persons of our firm created Vista Holding Co., a special purpose vehicle, for the purpose of raising funds and obtaining a bank charter for an affiliated bank, Ventura National Bank and Trust. A conflict of interest exists because representatives of our firm may refer or recommend that clients invest in Vista Holding Co. and/or use the services of Ventura National Bank & Trust. This creates an incentive for representatives of our firm since they will benefit materially from the success of the bank.

Additional information about our conflicts of interest is in Items 4, 5 and 12 of our Firm Brochure and Item 9 of our Wrap Fee Program Brochure, which are available online at <https://adviserinfo.sec.gov/firm/summary/312082>.

Questions to Ask Us: How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our financial professionals are compensated based on the revenue our firm earns from their advisory services or recommendations, the amount of client assets they service, and the time and complexity required to meet a client's needs. In addition, they may be compensated based on the type of product sold and/or product sales commissions.

Do you or your financial professionals have legal or disciplinary history?

No, our firm and financial professionals do not have any legal or disciplinary history to disclose. Visit www.investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Questions to Ask Us: As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

You can find additional information about our firm's investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD #312082. You may also contact our firm at 314-518-5240 to request a copy of this relationship summary and other up-to-date information.

Questions to Ask Us: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?