

Item 1: Cover



CLEARBROOK
INVESTMENT MANAGEMENT

Form ADV Part 2B: Brochure Supplement

Shara Pagels
CRD #5634876

Clearbrook Investment Management, LLC
940 Kelly Road
Bellingham, WA 98226

Date of supplement: 9/4/2021

This Brochure Supplement provides information about Shara Pagels that supplements the Clearbrook Investment Management, LLC (“Clearbrook”) Brochure. You should have received a copy of that Brochure. Please contact Clearbrook if you did not receive Clearbrook’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Shara Pagels is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Shara Pagels, CPA
Financial Adviser
DOB: 12/10/1980

Ms. Pagels has completed a degree in Business Administration- Accounting from Washington State University.

Business background for preceding five years:

9/2017 – Present	Tax Preparer Avlon Finance, LLC
8/2016 – Present	Investment Adviser Representative Clearbrook Investment Management, LLC
4/2016 – Present	Owner Full Point Designed Services, LLC
2/2014 – 6/2016	Registered Assistant Private Client Services LLC
12/2013 – 4/2016	Client Service Team Trutina Financial

Explanation of qualifications for the Certified Public Accountant (CPA) designation

Certified Public Accountant (CPA): CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and

successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Item 3: Disciplinary Information

There are no disciplinary actions to disclose

Item 4: Other Business Activities

A. Investment-Related Business

In addition to being an Investment Adviser Representative of Clearbrook, Ms. Pagels is also licensed to sell life and disability and long-term care insurance in the state of Washington and is appointed with several insurance companies. She spends approximately 1 hour per month on insurance sales. Ms. Pagels receives commissions for the sale of insurance products.

This outside investment-related business relationship may present a material conflict of interest with clients as she may have an incentive to recommend the insurance product or Registered Investment Adviser service that pays the highest commission or bonus. Clearbrook mitigates this risk through company policies and procedures, disclosing all fees and commission received for selling a product to clients, Investment Adviser

Representative supervision, and a corporate culture that reinforces placing the client's interest above those of Clearbrook or its Investment Adviser Representatives.

B. Other Paid Occupations

Ms. Pagels is owner of Full Point Designed Services, LLC in Bellingham, WA. She spends greater than 120 hours per month on this activity. She is also tax preparer with an accounting firm, Avlon Finance, LLC in Bellingham WA and spends more than 25 hours per month on average on this activity.

Item 5: Additional Compensation

When appropriate, Ms. Pagels may refer clients to another investment advisor for money management. In this scenario, Clearbrook will be paid a solicitor's fee from the other investment advisor for doing so and Ms. Pagels may share in the fee. The solicitor's fee is disclosed to the client at the time of the transaction.

Item 6: Supervision

Ms. Pagels is supervised by Benjamin Scellick, Chief Compliance Officer. Mr. Scellick can be reached at (909) 353-3712.

Item 7: Requirements for State-Registered Advisers

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

A. Ms. Pagels 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:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) 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:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

B. Ms. Pagels has NOT been the subject of a bankruptcy petition at any time.