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January 13th, 2025

FORM ADV PART 2A
BROCHURE

This brochure provides information about the qualifications and business practices of *Strivus Wealth Partners.* If you have any questions about the contents of this brochure, please contact us at (904) 685-1505. The information in the brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about *Strivus Wealth Partners* is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for *Strivus Wealth Partners* is 173580.

Strivus Wealth Partners is a Registered Investment Adviser with the U.S. Securities and Exchange Commission. Registration with the Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 – Material Changes

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

Generally, *Strivus Wealth Partners* will notify clients of material changes on an annual basis. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly. In either case, we will notify our clients in a separate document. The following material changes have been made to this brochure since our last filing in December, 2024:

- Item 4 has been amended to reflect changes to the ownership and control of our firm.
- Items 4 and 5 have been amended to reflect our new services and fees associated.
- Item 7 has been amended to reflect our account minimums and types of clients.
- Item 8 has been amended to reflect the risks associated with buffered ETFs.
- Item 12 has been amended to describe our custodial relationship and their brokerage practices.
- Item 15 has been amended to reflect our limited custody due to Standing Letters of Authorization.

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Item 3 - Table of Contents

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Item 4 – Advisory Business

Strivus Wealth Partners, LLC is a Registered Investment Adviser in Jacksonville Beach, FL. We are organized under the laws of the State of Florida. We have been providing advisory services since 2015. Adam D. Van Wie, Managing Member, is the Principal owner and Chief Compliance Officer (CCO). Joey Loss, Investment Adviser Representative, is also a minority owner and Chief Planning Officer. We are an independent financial adviser providing financial planning and wealth management services using portfolio management and other related services.

Currently we offer the following investment advisory services, which are personalized to each individual client:

- ✓ Personal Financial Planning
- ✓ Portfolio Planning and Management

The following narrative describes our services and fees. Please refer to the description of each investment advisory service below for information on how we adapt services to each individual client's needs. For purposes of this document, the terms "we," "our," "us" and "SWP" refer to *Strivus Wealth Partners*, and the terms "you," "your" and "client" refer to you either as a client or prospective client of our firm. Also, you may see the term "Associated Person" throughout this brochure. As used in this brochure, our Associated Persons are the firm's officers, employees, and all individuals providing investment advice on behalf of the firm.

<u>Types of Advisory Services</u>

SWP is a fee-only firm, meaning the only compensation we receive is from our Clients for our services. We offer services to clients of SWP as outlined below. From time to time, SWP recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients are never obligated to utilize any third-party professional we recommend. SWP is not affiliated with nor does SWP receive any compensation from third-party professionals we may recommend.

Ongoing Financial Planning Services

This service involves working one-on-one with a financial planner ("planner") over an extended period of time. Through this ongoing arrangement, Clients are expected to collaborate with the planner to develop and assist in the implementation of their financial plan (the "plan"). The planner will monitor the plan, recommend any appropriate changes and ensure the plan is up-to-date as the Client's situation, goals, and objectives evolve.

Upon engaging the firm for financial planning, SWP is responsible for obtaining and analyzing all necessary qualitative and quantitative information from the Client that is essential to understanding the Client's personal and financial circumstances; helping the Client identify, select, and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the Client's current course of action and alternative courses of action to identify required changes that provide the best opportunity for the client to meet their financial goals; developing & presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and ongoing monitoring of the Client's progress toward the goals and objectives that the recommendations are based around. These components all require in-depth communication with the Client in order for the planner to establish a financial plan and implementation strategy that provides the Client with the most appropriate options in pursuing their established goals and objectives.

Investment Management Services

Our firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a Client's prior investment history, as well as family composition and background. Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as risk tolerance and tax considerations.

We primarily advise our Clients regarding investments in stocks, bonds, mutual funds, ETFs, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in Client's portfolio at the inception of our advisory relationship and/or other investment types not listed above, at the Client's request.

When we provide investment management services, Clients grant us limited authority to buy and sell securities on a discretionary basis. More information on our trading authority is explained in Item 16 of this Brochure. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Project-Based Financial Planning Services

Project Based financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address some or all of the following areas of concern. The Client and SWP will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- Business Planning: We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.

- Cash Flow and Debt Management: We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- College Savings: Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

- Employee Benefits Optimization: We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

- Estate Planning: This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- Financial Goals: We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

- Insurance: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

- Investment Analysis: This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

- Retirement Planning: Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

  If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- Risk Management: A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

- Tax Planning Strategies: Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Types of Investments

We offer advice on various types of investments, including, but not limited to, equity securities, corporate debt securities, commercial paper, certificates of deposit, municipal securities, mutual funds, exchange traded funds, US Government securities, and interests in partnerships investing in real estate.

Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship. You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Assets Under Management

As of December 31, 2024, *Strivus Wealth Partners* has $ 139,286,246 in discretionary assets under management. SWP manages all assets under management on a discretionary basis.

Item 5 – Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without penalty.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior Client consent. Please note, lower fees for comparable services may be available from other sources.

Ongoing Financial Planning

Annual fees for Ongoing Financial Planning are paid monthly or quarterly in advance, ranging from $0 to $2,500 a month or $0 to $7,500 a quarter ($0 - $30,000 annually). The fee range is dependent upon variables including the specific needs of the Client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract.

Investment Management Services

The fee is based on a percentage of assets under management and is negotiable. The annualized fees for investment management services are based on the following fee schedule and are negotiable at the adviser's discretion:

Assets Under Management	**Annual Advisory Fee**
$0 - $499,999	1.50%
$500,000 - $999,999	1.25%

$1,000,000 - $4,999,999	1.00%
$5,000,000 - $6,999,999	0.95%
$7,000,000 - $9,999,999	0.85%
$10,000,000 - $19,999,999	0.75%
$20,000,000 and Above	0.50%

The annual advisory fee is paid quarterly in advance, based on the value of Client's account(s) as of the last day of the billing period. The advisory fee is a straight tier. For example, for assets under management of $2,000,000, a Client would pay 1.00%.

Typically, we require a minimum of $100,000 to open and maintain an advisory account. However, in our discretion, we may allow accounts of members of the same household to be aggregated for purposes of determining the advisory fee and/or for meeting the stated account minimum. For example, we may allow aggregation where we service accounts on behalf of minor children of current clients, individual and joint accounts for spouses, and other types of related accounts. This consolidation practice is designed to allow you the benefit of an increased asset total, which could potentially result in the accounts being assessed a reduced advisory fee based on the breakpoints described in the above table.

Ongoing Financial Planning may be included at no additional cost for clients engaged in our Investment Management Services.

Project-Based Financial Planning

SWP charges either a fixed or hourly fee for Project-Based Financial Planning. Fixed fee rates range between $2,000 and $20,000. Our hourly rate is $400 per hour.

The fee range is dependent upon variables including the specific needs of the Client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract. SWP may request 50% of the fee be collected in advance with the remainder due upon completion of the services. SWP will not bill an amount above $1,200 more than 6 months or more in advance of rendering the services.

Fee Payment

For Investment Management services, we deduct our advisory fee from one or more account(s) held at an unaffiliated third-party custodian, as directed by the Client. Please refer to Item 15 of this Brochure regarding our policy on direct fee deduction. Clients may also pay by electronic funds transfer (EFT) or check. We use an independent third-party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

Termination and Refunds

Advisory services may be terminated, without penalty, upon at least 30 calendar days' written notice by either party to the agreement. Termination will become effective 30 calendar days after receipt of such notice or on another date as agreed to by the Client and the Advisor. If fees are paid in advance, a prorated refund will be given, if applicable, upon termination of this Agreement for any unearned fee. For fees paid in arrears, Client shall be charged a pro-rata fee based upon the number of days in the month/quarter up to the date of termination.

Additional Fees and Expenses

As part of our Investment Advisory Services to you, we may invest, or recommend that you invest in mutual funds and exchange-traded funds. The fees that you pay to our firm for Investment Advisory Services are separate and distinct from the fees and expenses charged by the mutual funds or exchange-traded funds (described in each fund's prospectus to their shareholders). These fees will generally include a management fee and other fund expenses. You may also incur a few transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the custodian through whom your account transactions are executed. We do not share in any portion of the brokerage transaction charges imposed by the custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange-traded funds, our firm, and others. For more information on our brokerage practices, please refer to the "Brokerage Practices" section of the brochure.

Compensation for the Sale of Insurance Products

No person in our firm is licensed to sell insurance products, and accordingly we will neither recommend nor sell specific insurance products. We will advise on the suitability of various insurance products that may be consistent with our clients' goals and objectives. Under no circumstances will anyone in our firm receive any compensation due to the sale of any insurance product.

Item 6 – Performance-Based Fees and Side-by-Side Management

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees, while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the "Advisory Business" section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your Advisory Account.

Item 7 – Types of Clients

We provide financial planning and investment management services to individuals, high net-worth individuals, pension and profit sharing plans, charitable organizations, corporations or other businesses, and trusts or estates and other investment advisers.

Our minimum account size requirement is $100,000 to open or maintain an account under our management. SWP may reduce or waive the minimum account size requirement on a case-by-case basis. We will also combine “household” account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

Our investment strategies and advice may vary depending upon each client’s specific financial situation. As such, we determine investments and allocations based upon your predetermined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Method of Analysis:

We may use one or more of the following methods of analysis when providing investment advice to you.

- Charting Analysis – involves gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which are used to predict future price movements based on price patterns and trends.
- Fundamental Analysis – involves analyzing companies and their industry groups, such as a company’s financial statements, details regarding the company’s product line, the experience and expertise of the company’s management, and the outlook for the company’s industry. The resulting data is used to measure the true value on the company’s stock compared to the current market value.
- Technical Analysis – involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.
- Cyclical Analysis – a type of technical analysis that involves evaluating recurring patterns and trends.
- Modern Portfolio theory (MPT) – a theory of investing which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently, minimizing risk for a given level of expected return, by carefully diversifying the proportion of various assets.

Associated Risks:

Charting and Technical Analysis – the risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Fundamental Analysis:

The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock’s value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Cyclical Analysis:

Economic and business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Investment Strategies:

We may use one or more of the following investment strategies when formulating investment advice:

- Long-term Purchases – securities purchased with the expectation that the value of securities will grow over a relatively long period of time, generally greater than one year.
- Short-term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Tax Considerations:

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians have begun reporting to the IRS the cost basis of **equities** acquired on or after January 1, 2011. Our firm will either instruct the custodian to use the first-in, first-out ("FIFO") accounting method for calculating and reporting the cost basis of your **equity** investments **or** the custodian will default to the FIFO method where no instruction is given.

You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes that a different accounting method is more advantageous, please provide written notice to our firm immediately, and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

Each type of security has its own unique set of risks associated with it, and it would not be possible to list here all the specific risks of every type of investment. Even with the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

We primarily recommend mutual funds and exchange-traded funds ("ETFs"). You should be advised of the following risks when investing in these types of securities:

Mutual funds are professionally managed collective investment companies that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual or exchange-traded funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, invests primarily in small-cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with the different types of securities. Other fund risks include foreign securities and currency risk, emerging market risks, small-cap, mid-cap and large-cap risk, trading risk, and turnover risk that can increase fund expenses and may decrease fund performance. Brokerage and transactions costs incurred by the fund will reduce returns.

An ETF is an investment fund traded on stock exchanges, much like stocks or equities. An ETF holds assets such as stocks, commodities, or bonds, and trades at approximately the same price as the net asset value of its underlying assets over the course of the trading day. Most ETFs track an index, such as the S&P500. However, some ETFs are fully transparent actively managed funds. Market risk is, perhaps, the most significant risk associated with ETFs. This risk is defined by the day-to-day fluctuations associated with any exchange-traded security, where fluctuations occur in part based on the perception of investors.

When appropriate, we will also recommend investing in buffered ETFs. This is a type of structured product investment seeks to provide investors with the upside of the underlying index, market benchmark or assets returns (generally up to a capped percentage stated in the ETFs prospectus and prospectus supplement) while also providing downside protection on the first predetermined percentage of losses. Similar to other ETFs, a buffer ETF will be designed to track a stated index, market benchmark, or asset. However, the buffer ETF will also use a portfolio of options and derivatives in order to achieve the stated capped return ("cap") and limitation of losses ("buffer").

Most buffer ETFs have a stated outcome or holding period (typically a 3 month or 12-month period), in order to realize the benefits of the hedge or limitation on losses. These limited outcome periods or holding periods mean that only those investors who purchase at the beginning of the outcome period (e.g., on the first date of rebalancing) and hold the ETF throughout the entire outcome period will be provided with the level of return/protection stated by the prospectus. Investors who invest in these ETFs at any time after the beginning of the outcome or holding period or who liquidate their investments in these ETFs before the end of the holding or outcome period, will receive different caps and buffers on gains and losses than those stated in the ETF prospectus or prospectus supplement. Fund sponsors often post the anticipated cap on returns, buffers, and days remaining in the outcome period on the funds' websites. The updated caps, buffers, and days remaining should be considered and analyzed by an investor before investing in the buffer ETF at any time other than the beginning of the outcome period and should further be reviewed prior to liquidating any investment in such ETFs prior to the conclusion of the applicable holding or outcome period. At the end of an outcome period, the buffer ETF will roll into a new set of option contracts with the same buffer level and term length, but a new upside cap. This upside cap may be higher or lower than the preceding period and will depend on market conditions at the time. Additionally, the expenses associated with the new options contracts may impact the expenses of the ETF, which could impact returns to investors who hold these ETFs through multiple outcome periods.

Investors should understand that buffer ETFs are complex products with complicated and layered strategies. There are unique risks and considerations that investors must understand and accept before purchasing a buffer ETF. Investors should consider the following implications before purchasing a buffer ETF:

1. Exposure to the index is likely limited to price returns. Dividends and income are not included.
2. Downside protection is not eliminated and is only "buffered". Accordingly, if a given buffer ETF has a stated buffer of 10% and the underlying reference index falls 25% during the outcome period, that investor will experience a roughly 15% loss. This loss will be further increased once management fees are subtracted from the portfolio.
3. The buffer ETFs upside return is capped. Investors will not be compensated if the underlying reference index experiences a higher return that the stated cap. This cap is established to offset the costs of purchasing options to create the downside buffer, therefore the cap and buffer are inversely related. Thus, if investors require more downside protection, the trade-off is a lower upside cap (meaning a lower upside return). Conversely, if an investor requires a higher upside return it will result in less downside protection.
4. Due to the strategies employed these funds will generally exhibit a greater potential for loss than the potential for gain. In other words, by capping the upside, investors miss out on gains that exceed the upside cap, but they still participate in all downside losses beyond the stated buffer.
5. Because these buffer ETFs trade in options that are volatile in price, investors who invest in these ETFs beyond the initial holding or outcome period may experience losses due to the price fluctuations in the trading of options contracts at the start of the new holding period. It is therefore not recommended to hold these investments beyond the stated outcome or holding period.

Investors should also be aware that in addition to these risks unique to buffer ETFs, these products also face the same general risks associated with any ETF product. Please see the "ETF Risks, including Net Asset Valuations and Tracking Error" paragraph in this section above for more information regarding risks associated with ETFs.

Item 9 – Disciplinary Information

Criminal or Civil Actions
SWP and its management persons have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings
SWP and its management persons have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings
SWP and its management persons have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of SWP or the integrity of its management.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation
Neither SWP or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Other Affiliations
Neither SWP or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Recommendation of Other Advisers
SWP does not select, recommend, or utilize other advisers.

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

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines.

Our Code of Ethics also requires that certain persons associated with our firm submit reports of their personal account holdings and transactions to a qualified representative of our firm who will review these reports on a quarterly basis. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

We do not have material financial interest in client transactions beyond the provision of Investment Advisory Services as disclosed in this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you, or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities.

Item 12 – Brokerage Practices

We recommend and utilize the brokerage and custodial services of a particular custodian based on which is in your best interest. These custodians are generally securities broker-dealers and members of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Depending on the needs of the client, we will recommend custodying client assets with Charles Schwab & Co., Inc., Altruist Financial, LLC, Nationwide Securities, LLC, and/or My529. We may also apply with other similar organizations, when and if reasons to do so are encountered.

Factors Used to Select Custodians
SWP does not have any affiliation with any custodian we recommend. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending custodians, we have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our clients.

<u>Research and Other Soft-Dollar Benefits</u>
SWP does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Altruist may provide us with certain services and products that may benefit us. All such soft dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.

SWP maintains an institutional relationship with custodians whereby the custodians provide certain benefits to SWP, including a fully digital account opening process, a variety of available investments, and integration with software tools that can benefit SWP and its Clients.

<u>Brokerage for Client Referrals</u>
We receive no referrals from a custodian, broker-dealer or third party in exchange for using that custodian, broker-dealer or third party.

<u>Clients Directing Which Broker/Dealer/Custodian to Use</u>
We do recommend a specific custodian for Clients to use, however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific custodian to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients money over using a lower-cost custodian.

Block Trades

We may combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as “block trading”). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.p

Item 13 – Review of Accounts

Your assigned investment advisor representative will be responsible for his/her own clients and will monitor your account(s) on a continuous basis to ensure the advisory services provided to you are consistent with your investment needs and objectives. We recommend a Client meeting and formal account review at least annually, and a reminder postcard will be sent out to you in order to schedule a meeting. Quarterly Portfolio Performance Reviews are available at your request. All reviews are subject to oversight by Adam D. Van Wie, Chief Compliance Officer (CCO). You are encouraged to contact us with any questions, or if changes in your Financial situation or investment guidelines occur.

If you are unable to meet with your investment advisor representative, a copy of an annual report will be mailed to you. Triggering factors that may stimulate additional reviews include, but are not limited to, significant market corrections, large deposits or withdrawals from an account, and your request for an additional review.

You will receive monthly and/or quarterly reports from the custodian holding your funds and securities and have electronic access to the same.

Item 14 – Client Referrals and Other Compensation

We do not receive any compensation from any third party in connection with providing investment advice to you, nor do we compensate any individual or firm for client referrals.

Please refer to the "Fees and Compensation" section in this brochure, for details regarding the compensation that may be associated with the purchase of insurance products.

Item 15 – Custody

Provided we receive written authorization, we will instruct your account custodian to directly debit your account(s) for the payment of our advisory fees. This ability to deduct advisory fees from your accounts causes our firm to exercise **limited** custody over your funds. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. If you did not receive a statement from your custodian, please contact us directly at the telephone number on the cover page of this brochure.

Custody is also disclosed in Form ADV because Advisor has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). The firm endeavors to comply with the SEC no-action letter to the Investment Adviser Association dated February 21, 2017 in this regard.

Item 16 – Investment Discretion

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Before we can buy or sell securities on your behalf, you must first sign our Discretionary Management Agreement, a Power of Attorney, and/or a trading authorization form.

You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages or the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of specific industry or security. Please refer to the "Advisory Business" section in this brochure for more information on our discretionary management services.

Item 17 – Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we will contact you by electronic mail, in which case we would forward any electronic solicitation to vote proxies.

Item 18 – Financial Information

Our firm does not have any financial condition or impairment that would prevent us from meeting our commitments to you. Further, we are not required to provide a financial statement, because we do not require the payment of fees six or more months in advance and in excess of $1,200, nor do we serve as custodians or trustee of client funds or securities.