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This brochure provides information about the qualifications and business practices of Summit Wealth Advocates, LLC (hereafter referred to as "Firm" or "SWA"). If you have any questions about the contents of this brochure, please contact us at 612-987-9112. 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.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about Summit Wealth Advocates, LLC also is available on the SEC's website at www.adviserinformation.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 151330.

Item 2 Material Changes

This section of the Brochure summarizes “material changes” since SWA’s last update on February 16, 2022.

Item 4: SWA was acquired by Avantax WM Holdings, Inc. on June 30, 2023. Additional information was included to describe SWA’s services related to “held-away” assets and conflicts of interest specific to retirement investors.

- As of November 27, 2023, Avantax, Inc. was acquired by Aretec Group, Inc. As a result, Avantax, Inc. became a privately held company, and its stock is no longer traded on Nasdaq. Additionally, SWA’s ownership structure changed, and it became affiliated with Cetera Financial Group, Inc. (“Cetera Financial Group”), an indirect subsidiary of Aretec, as more fully described in **Item 4 and Item 10**.

Item 5: Additional information was included related to fees and costs associated with the management of “held-away” assets.

Item 8: Investment risk disclosures were enhanced to include risks associated with mutual funds, exchange traded funds (“ETFs”), investment activities involving the integration of environmental, social, and governance (“ESG”) factors and investments that incorporate an intention to generate measurable, beneficial social or environmental impact (“SRI”).

Item 10: SWA is now affiliated through common ownership with several financial service entities (“Affiliates”), including but not limited to another SEC registered investment adviser, Avantax Planning Partners, Inc. (“APP”). Various investment advisor representatives of SWA are also registered as an investment advisor representative of APP. SWA’s affiliation with APP creates a conflict of interest, as SWA may be incentivized to recommend APP versus other similar, non-affiliated investment advisers.

Item 11: SWA’s investment advisor representatives may purchase or sell securities, at or around the same day/time as those securities are recommended to clients, creating a potential conflict of interest and SWA has policies in place to monitor such.

Item 12: Additional information was included related to SWA’s recommended custodians and best execution. The final decision to custody assets with any custodian is made by SWA’s clients.

Item 14: SWA may recommend that clients or potential clients use SWA’s Affiliates (as described in [Item 10](#)), creating a conflict of interest. Clients and prospective Clients are not under any obligation to obtain professional services or products (of any kind) from any of SWA’s Affiliates or the Affiliates’ financial professionals. Additionally, SWA’s supervised persons are employees of a subsidiary of Avantax, Inc. and are compensated through base salaries and other employee benefits, and may also receive a discretionary bonus based on

a portion of revenue or assets under management of SWA, its Affiliates or both.

For additional details, please see the Item, referenced in the summary above, in this Brochure. Additional editorial and non-material changes were made throughout this Brochure.

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Item 4 Advisory Business

Summit Wealth Advocates, LLC (hereafter referred to as "Advisor" or "SWA") is a SEC-registered investment adviser with its principal places of business located in Minnesota. SWA began conducting business in October 2010 and on June 30, 2023 was acquired by Avantax WM Holdings, Inc. ("Avantax WM"). Avantax WM is an indirect subsidiary of Avantax, Inc. As of November 27, 2023, Avantax, Inc. was acquired by Aretec Group, Inc. As a result, Avantax, Inc. became a privately held company, and its stock is no longer traded on Nasdaq. Additionally, SWA became affiliated with Cetera Financial Group, Inc. ("Cetera Financial Group"), an indirect subsidiary of Aretec. For more information on Avantax WM, Avantax, Inc., and other financial industry activities and affiliations, see [Item 10](#).

As of December 31, 2022, SWA manages approximately \$314,938,497 in total assets. SWA managed \$295,131,992 on a discretionary basis and \$19,806,505 on a non-discretionary basis.

SWA has developed the **Peak Wealth Management Process** that allows us to focus our efforts on behalf of each Client according to their specific situation by recognizing which Phase of financial life they are currently experiencing.

Phase I: "Base Camp" – Growth & Accumulation Phase

Individuals and families in the initial phase of life are dealing with a variety of unfamiliar financial concerns. Thus, the reason you must establish a good "base camp" from which to travel through life. Clients in Phase I typically deal with specific matters such as:

- Creating a financial strategy that outlines the specific financial goals you are looking to accomplish
- Learning to live within your means and saving moderately to aggressively
- Establishing an emergency fund containing 3 to 6 months of lifestyle needs
- Properly leveraging employer benefits
- Pre-qualifying for your first home purchase and structuring that purchase appropriately
- Capitalizing on low to moderate income tax brackets by designing a multi-year tax minimization strategy
- Properly protecting your family with an appropriate insurance coverage platform
- Designing and implementing an estate plan (wills) for a young family

Phase II: "The Ascent" – Protection, Diversification & Tax Minimization Phase

As individuals and families mature and begin their ascent into Page II of life, they naturally begin to experience the following issues:

- Maximizing savings opportunities as you approach your peak wealth generation years
- Transitioning from an aggressive investment portfolio to a more balanced and globally diversified portfolio

- Considering the purchase of a second home or rental real estate
- Reviewing insurance coverage and deliberating increasing risk levels to reduce premium costs
- Contemplating the need for trusts versus wills, to avoid probate
- Pondering the benefits of starting your own business

Phase III: “The Pinnacle” – Financial Security (Retirement) Phase

Financial Security means something different for everyone. Those in Phase III typically contend with:

- Determining whether this phase of life entails working full-time, part-time or not at all
- The “staging” of your portfolio to focus more on cash flow generation and principal protection
- Reviewing all insurance coverage to determine the necessity of it, as well as the appropriate level for each type
- Deciding whether to downsize your current home and the potential purchase of one or more retirement homes
- Developing strategies to help you maximize the Social Security benefits you receive over your lifetime
- Considering the benefits of trusts and whether charity will play a role in your estate plan

For Clients at each Phase, SWA offers the following advisory services to our Clients, according to their needs:

Wealth Management Strategy

SWA’s Wealth Management Strategy is comprised of two stages. The first stage is a Financial Plan One-Time Service, as outlined below. The Financial Plan One-Time Service includes elements of the forgoing Phases, as agreed between the Client and SWA, and will serve as the basis for on-going Wealth Management. The second stage is Wealth Management in an on-going basis. Wealth Management focuses on implementation, and where needed, update of the Financial Plan.

In addition, the Wealth Management Strategy may include some or all of the following services: Individual Portfolio Management, as outlined below, through a low cost passive or index approach to investment management, employer provided retirement plan portfolio management / guidance, annual update of financial projections, annual review of tax returns, multi-year tax projections, college fund planning, review of mortgage debt and recommended modification, estate plan review, implementation assistance of financial recommendations, update of financial goals, and up to four annual meetings with an SWA investment advisor representative.

FINANCIAL PLAN ONE-TIME SERVICE

This service includes financial recommendations, either written or orally communicated, based on the analysis of multiple financial concerns and the 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. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the financial / life situation of the Client. Clients retaining this service receive a written report which provides the Client with a detailed financial plan designed to assist the Client in achieving his / her financial goals and objectives.

In general, the financial plan can address any or all of the following areas, as agreed between the Client and SWA:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and personal financial goals. We define the role that debt plays in leveraging wealth potential.
- **TAX & CASH FLOW:** We analyze the Client's income tax and spending, planning with consideration of the past, current and future years; then, illustrate the impact of various investments on the Client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the Client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the Client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the Client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the Client in assessing and developing long-term estate strategies, including as appropriate the following: living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law. **Note:** SWA does not draft estate documents or practice law.

We gather required information through in-depth personal interviews. Information gathered includes the Client's current financial status, tax status, future goals, return objectives and attitudes towards risk. We review documents supplied by the Client, including a questionnaire completed by the Client, and prepare a written report. We recommend that the Client retain SWA to assist with the implementation of the Financial Plan and Investment Management ("Wealth Management Strategy," described below), however implementation of financial plan recommendations is entirely at the Client's discretion.

The financial plan is typically presented to the Client within two months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided. All Financial Planning recommendations regarding products or services are of a generic nature.

WEALTH MANAGEMENT (ON-GOING)

After the financial plan is delivered and accepted by the Client, we begin the Wealth Management stage of the relationship. This stage will include on-going support and assistance in the implementation of the financial plan. Support is customized to the financial Phase the Client may be in and considers individual circumstances. Support includes:

- **TAX PLANNING:** We analyze the Client's income tax needs and make recommendations to

take advantage of situations that may benefit the Client tax situation in the near term and long-term. We assist the tax preparer in compiling Client tax information to facilitate an accurate tax return. We review tax returns for additional tax savings opportunities. We also design and assist in implementing multi-year and multi-generational tax minimization strategies. *Note: SWA prepares tax projections but does not prepare tax returns for filing purposes.*

- INVESTMENTS: We analyze investment alternatives and their effect on the Client's portfolio. See INDIVIDUAL PORTFOLIO MANAGEMENT below.
- RETIREMENT: We analyze current strategies and investment plans to help the Client achieve his / her retirement goals as directed in their financial plan. SWA will adjust the Client's financial plan annually, or as Client needs or circumstances change.
- EDUCATION PLANNING: Where applicable, SWA will assist in evaluating needs for a Client, Client's children or grandchildren's college expenses.
- CASH FLOW: SWA reviews the Client's cash needs during retirement and identifies a tax sensitive cash flow disbursement plan, considering, as applicable, Client investments, employer pensions, Social Security, and other sources of income during retirement.
- INSURANCE: We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- ESTATE: We assist the Client in working with their estate planning attorney to prepare estate planning documents. SWA assists in titling assets as recommended by the estate planning attorney. *Note: SWA does not draft estate documents or practice law.*
- CHARITABLE PLANNING: Where applicable, SWA evaluates tax efficient manners of charitable giving.

INDIVIDUAL PORTFOLIO MANAGEMENT

As part of our Wealth 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 strategy and create and manage a portfolio based on that strategy.

During our data-gathering process, we determine the Client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a Client's prior investment history, as well as family composition and background. Individual Portfolio Management may include, but are not limited to the following:

- Investment Strategy
- Personal Investment Policy Statement
- Asset Allocation
- Asset Selection
- Risk Tolerance
- Regular Portfolio Monitoring

We manage these advisory accounts on a discretionary or non-discretionary basis. Account

supervision is guided by the Client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. In limited circumstances, Clients may request certain reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

SWA does not currently provide Investment Portfolio Management as a stand-alone service to new Clients. SWA, at its discretion, may provide these services to existing Clients or Client family members.

Held Away Assets: SWA will provide investment advisory services on Client assets "held-away" at other custodians, administrators or product providers on a discretionary or non-discretionary basis.

Non-discretionary, investment advisory services related to held-away assets (referred to as "unmanaged accounts"), generally applies to retirement accounts, such as 401(k)s and 403(b)s, and variable insurance products and other Client accounts where SWA is providing limited services. In this regard, investment selection is generally limited to the investment options approved by the plan administrator or product provider. Because of this, SWA's investment advisory services to held-away accounts are limited to those available investment options and may be subject to other service limitations, as disclosed to the Client in a separate written agreement.

If a Client elects to engage SWA's discretionary, investment advisory services for held-away assets, SWA may use a third-party intermediary's order management system to facilitate trading activities. Under this arrangement, the Client will be required to enter a user-agreement with the third-party, detailing the arrangement. For additional information regarding costs and potential conflicts of interest, see [Item 5](#). Alternatively, with the Client's authorization, SWA may directly access the Client's held-away assets for trading purposes. For additional information regarding custody, see [Item 15](#).

Retirement Investors: When SWA (the Firm and your investment advisor representative) provide investment advice to you (the Client or prospective Client) regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act of 1974, as amended ("ERISA") and/or the Internal Revenue Code, as amended ("IRC"), as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. We have a conflict of interest with you when we recommend a rollover / transfer of retirement assets and receive more compensation as a result. We mitigate this conflict of interest by providing you with relevant information, reviewing that information with you, answering your questions, and recommending only alternatives that we believe are in your best interest. We have provided you with other required disclosures, along with your account terms and conditions and/or advisory agreement that describe the specific services we will perform and/or terms and conditions of our relationship with you. This is important information so please read it carefully.

Item 5 Fees and Compensation

SWA offers an initial meeting free of charge to allow a prospective Client to determine the extent to which SWA financial planning services are most beneficial to the Client for their circumstances. An overview of fees, by service, are provided below and are clearly outlined in each Client's advisory contract.

WEALTH MANAGEMENT STRATEGY

FINANCIAL PLAN - ONE-TIME SERVICE FEE (one-time)

SWA's Financial Planning fee is determined based on the nature of the services being provided and the complexity of each Client's circumstances. All fees are negotiable and agreed upon prior to entering into a contract with any Client. Generally, SWA's Financial Planning fee is a fixed fee and ranges from \$500 - \$2,750. We may request a retainer of \$500 upon completion of our initial fact-finding session with the Client. The balance is due upon delivery of the plan. Once the financial plan is delivered and accepted by the Client, the Client may proceed to the "On-Going Wealth Management" phase of the relationship. Clients should be aware that there is a conflict of interest as SWA has a financial incentive to recommend our own wealth management services on an ongoing basis after completion of the financial plan. However, the Client is not obligated to use any of these services and may seek assistance from other professionals to execute the plan.

WEALTH MANAGEMENT FEE – On-going (Annual Rate)

Wealth Management Fee rates cover on-going support and update of the financial plan, as well as comprehensive analysis for existing investments owned, a comprehensive review of the Client's risk / reward profile, strategic diversification of existing holdings (if necessary) and an overall investment strategy. This charge includes reasonable account set up / transfer time and entry of cost basis information (if applicable). SWA may, at its discretion, charge an hourly fee of \$175 for unusual circumstances in account set-up and transfer; SWA will notify the Client in advance of any additional fee for account set-up / transfer.

Household Assets Under Management	Amount	Global Index Strategies	Actively Managed Strategies (Employer Retirement Plans)
\$0 - \$500,000*		1.00%	1.25%
\$500,001 - \$750,000		0.95%	1.20%
\$750,001 - \$1,000,000		0.90%	1.15%
\$1,000,001 - \$2,000,000		0.85%	1.10%
\$2,000,001 - \$3,000,000		0.80%	1.05%
\$3,000,001 - \$4,000,000		0.75%	1.00%
\$4,000,001 - \$5,000,000		0.70%	0.95%
\$5,000,001 - \$10,000,000		0.65%	0.90%
Above \$10,000,001		0.60%	0.85%

*A minimum fee for Wealth Management Services is \$1,250 per quarter. For purposes of meeting

this minimum, SWA includes Client's immediate household aggregate portfolios in calculating the minimum fee. SWA may also group certain related Client accounts for the purpose of achieving the minimum annualized fee. The fee may be negotiable.

INDIVIDUAL PORTFOLIO MANAGEMENT (Stand-Alone)

SWA does not currently provide Investment Portfolio Management as a stand-alone service to new Clients. SWA, at its discretion, may provide these services to existing Clients or Client family members.

The annualized fees for Investment Portfolio Management (Stand-Alone) are charged as a percentage of assets under management, according to the following schedule, but may be negotiable.

Investment Management Fee Rates (Annual)

Household Assets Under Management	Amount	Global Index Strategies	Actively Managed Strategies (Employer Retirement Plans)
\$0 - \$500,000		0.75%	1.00%
\$500,001 - \$750,000		0.70%	0.95%
\$750,001 - \$1,000,000		0.65%	0.90%
\$1,000,001 - \$2,000,000		0.60%	0.85%
\$2,000,001 - \$3,000,000		0.55%	0.80%
\$3,000,001 - \$4,000,000		0.50%	0.75%
\$4,000,001 - \$5,000,000		0.45%	0.70%
\$5,000,001 - \$10,000,000		0.40%	0.65%
Above \$10,000,001		0.35%	0.60%

GENERAL INFORMATION

How Fees are Calculated: Fees are invoiced and due quarterly. Billing amounts are based upon the value (market value or fair market value in the absence of market value) of the Client's account(s) (including both securities and cash) at the end of the previous quarter (or, for new Client accounts, upon the date that assets are under advisement by SWA). For contributions to a new account after a quarter-end, but prior to the end of the subsequent quarter, SWA will charge a pro-rated fee, based on the remaining days in the quarter, from the date contribution is received. Valuations are derived from recognized and independent pricing sources, such as Charles Schwab & Co., Inc., TD Ameritrade, Inc., or other custodians.

Limited Negotiability of Advisory Fees: Although SWA has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on an investment adviser representative-by-investment adviser representative, Client-by-Client or account-by-account basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the Client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition and reports, among other factors. The specific annual fee schedule is identified in the contract between the

adviser and each Client.

We may group certain related Client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee. Discounts, not generally available to our advisory Clients, may be offered to family members of supervised persons of our firm.

When Authorized, Deduction of Fees from Client's Accounts: Clients may choose whether to have their fees billed directly or deducted from Client accounts. In certain situations, such as for some qualified retirement plan accounts and traditional IRA accounts, it may be advantageous to the Client, from a tax perspective, to have the portion of SWA fees attributable to such accounts directly deducted from such account. Where fees are to be deducted from a Client's account, SWA will request authority from Clients to receive quarterly payments directly from the Client's account (s) held by an independent qualified custodian, such as Charles Schwab & Co., Inc. or TD Ameritrade, Inc. Clients may provide written limited authorization to SWA to withdraw fees from account(s). SWA will send the Client an invoice showing the amount of the fee, the value of the assets on which the fee was based and the specific manner in which the fee was calculated. Clients should verify the accuracy of the fee calculations in such invoices. Clients will also receive custodial statements showing the advisory fees debited from their account(s). The Client is billed quarterly in advance; fees are deducted quarterly, as soon as practical at the beginning of the current quarter.

Termination of the Advisory Relationship: A Client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of an account, any prepaid, unearned fees will be promptly refunded. In calculating a Client's reimbursement of fees, we will prorate the reimbursement according to the number of days remaining in the billing period; or in the case of financial planning, actual hours worked.

Mutual Fund Fees: All fees paid to SWA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and / or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a Client may pay an initial or deferred sales charge. However, SWA does not collect any sales charges; any such fee is retained by the custodian. A Client could invest in a mutual fund directly, without our services. In that case, the Client would not receive the services provided by our firm which are designed, among other things, to assist the Client in determining which mutual fund or funds are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the Client and to thereby evaluate the advisory services being provided.

Separately Managed Account Fees: Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the independent advisers, which may be charged as part of a wrap fee arrangement. In a wrap fee arrangement, Clients pay a single fee for advisory, brokerage and custodial services. Client's portfolio transactions may be executed

without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the Client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the Client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with Clients any separate program fees that may be charged to Clients.

Additional Fees and Expenses: In addition to our advisory fees, Clients are also responsible for transaction fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the Client's account(s). Please refer to [Item 12](#) for additional information.

Grandfathering of Minimum Account Requirements: Pre-existing advisory Clients are subject to SWA's minimum account requirements and advisory fees in effect at the time the Client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among Clients.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

External Compensation for the Sale of Securities to Clients: We do not receive any external compensation for the sale of securities to Clients, nor do any of our investment advisor representatives.

Held-Away Assets: As described in [Item 4](#), SWA may charge a fee on the Client's held-away assets or separately provide the Client with a written invoice. Based on a Client's instruction, this fee could be deducted from another account that SWA manages for the Client or paid directly by the Client to SWA. The specific fee schedule is established in the written advisory agreement. Additionally, if a Client elects to engage SWA's discretionary, investment advisory services for held-away assets, the cost of the third-party intermediary's order management system and SWA's associated administrative cost, both included in SWA's advisory fee, are outlined in the Client's investment advisory agreement.

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

SWA does not charge performance-based fees (i.e., fees based on a share of capital gains on or capital appreciate of the assets of a Client's assets) nor does it engage in side-by-side management (i.e., manage Client accounts that are charged a performance-based fee and accounts that are charged another type of fee).

Item 7 Types of Clients

SWA provides advisory services to high-net-worth individuals, individuals and members of their household and small and medium businesses. SWA generally requires a minimum Client relationship size of \$500,000 for Wealth Management Services. This minimum is negotiable client-by-client, account-by-account.

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

METHODS OF ANALYSIS

We use a fundamental method of analysis in formulating our investment advice and / or managing Client assets. Mutual funds and ETF basis of selection and on-going monitoring includes the following criteria:

- Track history of fund and fund family Manager tenure
- Assets managed by fund manager
- Asset class composition of fund
- Style consistency of fund to peer group
- Net expense ratio
- Fund actual return versus expected performance given its risk level
- Risk adjusted return compared to peer group
- Historical returns compared to peer group

Fundamental Analysis. We, or mutual funds and ETFs we select attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Asset Allocation. Rather than focusing only on security selection, we also attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the Client's investment goals and risk tolerance.

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no

longer be appropriate for the Client's goals.

Mutual Fund and / or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other fund(s) in the Client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and / or ETF analysis is that, as in all security investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the Client may purchase the same security, increasing the risk to the Client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the Client's portfolio.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategy(ies) in managing Client accounts, provided that such strategy(ies) are appropriate to the needs of the Client and consistent with the Client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them in the Client's account for a year or longer. Typically, we employ this strategy when we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a Client. A security may decline sharply in value before we make the decision to sell.

Option writing. We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options we may utilize are calls and puts.

Note: In the following three (3) paragraphs is a general discussion of how some options operate. The use of the term "you" or "Client," not capitalized, in this section is meant in the generic sense; we do not mean to imply this strategy is applied in any or all instances or indicate a specific or

individualized strategy for current or prospective Clients.

- A call gives us the right to buy an asset at a certain price within a specific period of time. We may buy a call if we have determined that the stock may increase substantially before the option expires. A put gives the holder the right to sell an asset at a certain price within a specific period of time. We may buy a put if we have determined that the price of the stock may fall before the option expires.
- We may also use options to "hedge" a purchase of the underlying security; in other words, we will use an option purchase to limit the potential upside and downside risk of a security we have purchased for a Client, or a Client currently holds in their portfolio.
- We may use "covered calls," in which we sell an option on a security that a Client owns. In this strategy, the Client receives a fee / premium for making the option available, and the person purchasing the option has the right to buy the security from the Client at an agreed-upon price.

SWA offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each Client. SWA establishes portfolio objectives for each Client. The objectives outline the Client's current situation (income, tax, and risk tolerance), and SWA then constructs a general plan, to aid in the selection of a portfolio that matches the Client's specific situation.

SWA believes that markets are predominantly efficient. As a result of this philosophy, SWA predominantly utilizes low-cost passive or index-based funds or Exchange Traded Funds (ETF) that track asset classes. SWA constructs portfolios that provide broadly diversified asset exposure, while minimizing the cost of security ownership. In situations where passive or index-based funds are not available, such as employer ERISA plans, SWA will consider expense and asset class tracking when recommending funds for inclusion in the Client portfolio.

SWA believes that taxes are an important consideration when creating a portfolio. For taxable accounts we consider tax efficient funds with low-turnover.

SWA will create a portfolio consisting of one or more of the following: no-load mutual fund, Exchange Traded Funds (ETF), load waived mutual funds, and in certain circumstances may include individual equities, or individual bonds. SWA will allocate the Client's assets, taking into consideration Client's tolerance for risk, time horizon, expected return, specific asset identification by Client for exclusion or inclusion and tax situation. SWA has access to certain institutional class funds, which may not be available to retail investors.

Tax Efficiency. SWA utilizes asset location strategies to determine the proper account to place investments in to attempt to get the most favorable tax treatment overall, applied across the Client's total portfolio. While tax efficiency is emphasized, Client goals and timing of those goals are considered in implementation of the asset location strategy.

INVESTMENT and GENERAL RISKS

Investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of, nor predictable by SWA. Such

factors include a wide range of economic, political, competitive, technological and other conditions (including acts of terrorism and war or regional/global pandemic) that affect investments in general or in specific industries or companies. The investment decisions made, and the actions taken in managing Client assets will be subject to various market, liquidity, currency, economic, political and other risks. Investing in securities involves a risk of loss that Clients should be prepared to bear. The investment performance and the success of any investment strategy or particular investment can never be predicted or guaranteed, and the value of a Client's investments will fluctuate due to market conditions and other factors. Investments may lose value and past performance is never a guarantee of future results.

The information contained in this Brochure cannot disclose every potential risk associated with an investment strategy, nor all of the risks applicable to a particular manager, security or investment. Risks vary by Client according to their investment objectives, guidelines, liquidity needs or risk tolerances and not every strategy or portfolio will be exposed to each of the risks described in this Brochure. This list is not intended to be exhaustive of all of the risks associated with investing in strategies or securities that are utilized or recommended by SWA. Rather, it is a general description of the nature and risks of the investment advisory services provided by SWA and the related investments.

Risk of Loss. Security investments are not guaranteed, and you may lose money on your investments. We ask each Client to work with us to help us understand their specific tolerance for risk. Our investment approach considers each investor's tolerance for risk. All investments are subject to certain risks that are borne by the investor. Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.

Mutual Funds Risk: The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers, and the fund straying from its objective (i.e., style drift). Mutual funds have certain costs associated with underlying transactions, as well as operating costs such as marketing and distribution expenses and underlying advisory fees. Mutual fund costs and expense vary from fund to fund and will impact a mutual fund's performance. Additionally, mutual funds typically have different share classes that trade at different Net Asset Value ("NAV") as determined at the daily market close and have different fees and expenses. Mutual funds that offer different share classes are priced differently and have varying levels of internal costs. For example, institutional share classes often have higher trading costs; however, the internal costs of the fund are lower. Over a period of time, certain share classes will become more expensive if held in an account for a long period of time. Additionally, even though multiple share classes may be available, a custodian may only make available a limited number of share classes, or a custodian may not choose to offer the least expensive share class that is available. Other custodians and investment advisers may offer the same mutual fund or a different mutual fund share class at a lower overall cost to the investor.

Risks Associated with Exchange Traded Funds ("ETFs"): ETFs are, by definition, portfolios of securities, and although the risk associated with investments in ETFs may be low relative to investments in securities of individual issuers, there are events that can trigger sharp, and

sometimes adverse, price movements in ETFs that are not related to movements of the markets in general. These events include, but are not limited to, unanticipated dividends, changes to regular dividend amounts, announcements of rights offerings and possible unexpected revisions to the net asset values of the ETF. ETFs are subject to market risk.

Environmental, Social and Governance (“ESG”) and Socially Responsible or Impact Investing (“SRI”): Certain of SWA’s investment activities involve integration of environmental, social, and governance (“ESG”) factors and investments that incorporate an intention to generate measurable, beneficial social or environmental impact (“SRI”). Such evaluation involves the review of third-party data as well as the analysis and judgment of SWA. SWA relies on information provided by third-parties, and there can be no guarantee that SWA’s due diligence, analysis, and/or judgement has fully ascertained all ESG or SRI factors in an investment process or the impact those factors may have on an investment’s performance. The returns on an ESG or SRI-focused investment may be lower or higher than on an investment more diversified or where decisions are based solely on financial considerations.

Item 9 Disciplinary Information

SWA is required to disclose any legal or disciplinary events that are material to a Client’s or prospective Client’s evaluation of our advisory business or the integrity of our management. Our firm and our management persons have no reportable legal or disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Clients should review the investment advisor representatives Form ADV Part 2B Brochure Supplement to determine whether the Client’s investment advisor representative is engaged in any of the activities described below. If the Client did not receive the investment advisor representative’s Form ADV Part 2B Brochure Supplement, the Client may contact SWA using the information on the cover page of this Brochure.

Financial Industry Affiliations

SWA is owned by Avantax WM Holdings, Inc. (“Avantax WM”). Avantax WM is directly owned by Project Baseball Sub, Inc. , which is directly owned by Avantax Holdings, LLC. Avantax Holdings, LLC is directly owned by Avantax, Inc. As a result, Avantax WM is an indirect subsidiary of Avantax, Inc.

As of November 27, 2023, Avantax, Inc. was acquired by Aretec Group, Inc. As a result, Avantax, Inc. became a privately held company, and its stock is no longer traded on Nasdaq. Additionally, SWA became affiliated with Cetera Financial Group, Inc. (“Cetera Financial Group”), an indirect subsidiary of Aretec. Cetera Financial Group owns a network of independent broker-dealers, investment advisers registered with the SEC, and general insurance agencies (“Cetera Related Entities”). These entities may be deemed to be related merely because we share common owners. Currently, SWA has (1) no business dealings with the Cetera Related Entities in connection with advisory services we provide; (2) we do not conduct shared operations with the Cetera Related

Entities; (3) we do not refer clients or business to the Cetera Related Entities, and the Cetera Related Entities do not refer prospective clients or business to us; (4) we do not share supervised persons or premises with the related persons; and (5) we have no reason to believe that our relationship with the Cetera Related Entities otherwise creates a conflict of interest with our clients. A complete list of related persons is available upon request by contacting our Firm at 612-987-9112.

Due to common ownership by Avantax WM, SWA is affiliated with the following financial service entities (collectively referred to hereafter as “Affiliates”), as further described below.

Note: Various investment advisor representatives of SWA and the Affiliates’ financial professionals may be registered with multiple Affiliates in multiple capacities. Additionally, SWA’s supervised persons are also employees of a subsidiary of Avantax, Inc. as more fully described in [Item 14](#). **SWA’s Clients and prospective Clients are not under any obligation to obtain professional services or products (of any kind) from any of SWA’s Affiliates or the Affiliates’ financial professionals.**

- **Affiliated Broker/Dealer:** Avantax Investment Services, Inc. (“AIS”) is a SEC-registered broker-dealer and government securities dealer or broker, member [FINRA/SIPC](#). AIS is authorized to solicit, buy and sell securities and variable life insurance and annuities in one or more states. SWA’s affiliation with AIS creates a conflict of interest, as SWA may be incentivized to recommend AIS versus other similar, non-affiliated broker/dealers. Clients are not under any obligation to purchase or sell any securities and variable life insurance and annuities products and may purchase or sell any such products through other, non-affiliated broker/dealers. Additional information about AIS is available on [brokercheck.finra.org](#), by searching “Avantax Investment Services, Inc.” or CRD#13686.
- **Affiliated Investment Advisers:** Avantax Advisory Services, Inc. (“AAS”) is an SEC-registered investment adviser. AAS provides financial planning, portfolio management, retirement plan services and other investment advisory services. Avantax Planning Partners, Inc. (“APP”) is a SEC-registered investment adviser. APP provides financial planning, portfolio management, pension consulting, retirement plan services and other investment advisory services. SWA’s affiliation with AAS and APP creates a conflict of interest, as SWA may be incentivized to recommend AAS and APP versus other similar, non-affiliated investment advisers. Clients are not under any obligation to obtain services from AAS or APP and may engage the services of other, non-affiliated investment advisers. Additional information is available on [www.adviserinformation.sec.gov](#), by searching “Avantax Advisory Services, Inc.” or CRD#104556 and “Avantax Planning Partners, Inc.” or CRD#106237. **Note:** Various investment advisor representatives of SWA are also registered as an investment advisor representative with APP.
- **Affiliated Insurance Agencies:** Avantax Insurance Agency, LLC (“AIA LLC”) and Avantax Insurance Services, LLC (“AIS LLC”) offer a variety of insurance products and services. SWA’s affiliation with AIA LLC and AIS LLC creates a conflict of interest, as SWA may be incentivized to recommend AIA LLC and AIS LLC versus other similar, non-affiliated

insurance agencies. Clients are not under any obligation to obtain products or services from AIA LLC and AIS LLC and may engage the services of other, non-affiliated insurance agencies. Insurance products and services are not deposits, not FDIC insured, not guaranteed by a bank, not insured by any federal government agency, and may go down in value. Not all insurance products and services are available in all states. *Note: SWA does not sell insurance products but may provide investment advisory services related to such.*

Other Financial Industry Activities

SWA nor any of its Affiliates serve as an attorney-at-law, accountant, or real estate broker or dealer. However, the Affiliates' financial professionals may serve as a lawyer, accountant, or real estate agent and/or be associated with a law firm, accounting firm, and/or real estate broker or dealer.

SWA nor any of its Affiliates have any relationship or arrangement with the following types of organizations/persons that is material to SWA's advisory business: municipal securities dealer, investment company or other pooled investment vehicle, futures commission merchant, commodity pool operator, commodity trading advisor, banking or thrift institution, or sponsor or syndicator of limited partnerships.

SWA is granted access by Dimensional Fund Advisors ("DFA") to its globally diverse family of mutual funds. DFA is an Austin, Texas-based mutual fund company with \$584 billion of assets under management, as of December 31, 2022. SWA is under no requirement by DFA to utilize only DFA mutual funds. SWA may recommend DFA mutual funds, although not exclusively, when we believe it is in the Client's best interest. There is no financial relationship between SWA and DFA.

SWA receives research from DFA that are received by other Registered Investment Advisor firms that are granted access to DFA mutual funds and include: seminars hosted by DFA explaining DFA mutual funds; academic instruction regarding investment theory and practice management. SWA is responsible for the cost of travel and travel expenses for members to attend seminars hosted by DFA. At seminars hosted by DFA, meals, speakers, and materials may be provided at no charge to SWA.

Advisor only access to the DFA website (us.dimensional.com) is provided to SWA, where additional academic research, practice management information, software and investment returns data is provided. DFA provides use of the DFA Returns and DFA Allocation Evaluator software and related data to assist in evaluating historical results and rates of return. However, SWA does not rely on research provided by DFA as its general or primary research resource.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our supervised persons, including compliance with applicable federal securities laws.

SWA's investment advisor representatives may purchase or sell securities, at or around the same day/time as those securities are recommended to Clients. This practice creates a situation where SWA and its investment advisor representatives are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. SWA has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of SWA's "Access Persons;" that is persons who have access to the Firm's nonpublic information. Specifically, our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

SWA's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all supervised persons are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory Clients and prospective Clients. You may request a copy by calling us at 612-987-9112.

Item 12 Brokerage Practices

As part of SWA's investment advisory services, SWA investment advisor representatives will recommend a custodian that is a broker-dealer and is also a member of FINRA and SIPC to maintain custody of Clients' assets and facilitate trades for the Clients' accounts (referred to as "custodians"). Currently, SWA utilizes the following custodians:

- Charles Schwab & Co., Inc. ("Schwab") and
- TD Ameritrade, Inc. ("TD Ameritrade").

Please note: The final decision to custody assets with any custodian is made by SWA's Clients, including Client accounts established under Employee Retirement Income Security Act of 1974, as amended ("ERISA") or Individual Retirement Account ("IRA") rules and regulations, in which case the Client is acting as either the plan sponsor or IRA accountholder. For more information about these custodians, Clients should refer to Investment Advisor Public Disclosure at www.adviserinfo.sec.gov or FINRA BrokerCheck at <https://brokercheck.finra.org/>. SWA is independently owned and operated and not affiliated with any custodian.

Generally, for discretionary Clients, SWA executes Client transactions through the designated custodian. Factors that SWA considers in recommending a custodian facilitating transactions, include the historical relationship with SWA, financial strength, reputation, execution capabilities, investment offerings, pricing, research, and service. A Client may pay a commission that is higher than another broker-dealer might charge to facilitate the same transaction where SWA determines, in good faith, that the commission and transaction fee is reasonable in relation to the value of the brokerage and services received by the custodian. In seeking best execution,

the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a services.

Aggregated or Block Trading

SWA will block trade where possible and when advantageous to Clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple Client accounts, such that each account may receive the same transacted security prices and be executed on a pro-rated basis between all accounts included in any such block.

Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. SWA will typically aggregate trades among Clients whose accounts can be traded at a given broker, and generally will rotate or vary the order of brokers through which it places trades for Clients on any particular day.

When trading in Client accounts, errors may periodically occur. SWA does not maintain any Client trade error gains. SWA makes each Client whole with respect to any trade error losses incurred by a Client that was caused by SWA.

Directed Brokerage

Should a Client choose a directed brokerage relationship, whereby a Client directs SWA to execute a transaction through a specified broker-dealer, it must be provided to SWA in writing. SWA would be required to disclose all of the following that may apply:

1. The advisor's inability under those circumstances to negotiate commissions;
2. Its inability to obtain volume discounts;
3. That there may be a disparity in commission charges among Clients; and
4. Any potential conflicts of interest arising from brokerage firm referrals.

Research and Other Benefits

Schwab and TD Ameritrade provide SWA with access to its institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as the adviser remains in good standing with Schwab and TD Ameritrade, respectively. These services are not contingent upon our firm committing to Schwab or TD Ameritrade any specific amount of business (assets in custody or trading commissions). Schwab's and TD Ameritrade's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our Client accounts maintained in its custody, neither Schwab nor TD Ameritrade generally charge separately for custody services but instead are compensated by account holders through trading commissions or asset-based fees (such as margin interest or on un-invested cash) for securities trades that are executed through Schwab or TD Ameritrade, or that settle into Schwab or TD Ameritrade accounts.

Schwab and TD Ameritrade also make available to our firm other products and services that benefit SWA but may not directly benefit our Clients' accounts. Many of these products and services may be used to service all or some substantial number of our Client accounts, including accounts not maintained at Schwab or TD Ameritrade.

Schwab's and/or TD Ameritrade's products and services that assist us in managing and administering our Clients' accounts include software and other technology that:

- provides access to Client account data (such as trade confirmations and account statements);
- facilitates trade execution and allocate aggregated trade orders for multiple Client accounts; provide research, pricing and other market data;
- facilitates payment of our fees from Clients' accounts; and
- assists with back-office functions, recordkeeping and Client reporting.

Schwab and/or TD Ameritrade also offer other services intended to help us manage and further develop our business enterprise. These services may include:

- compliance, legal and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab and/or TD Ameritrade may make available, arrange and / or pay third-party vendors for the types of services rendered to SWA. Schwab and/or TD Ameritrade may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab and/or TD Ameritrade may also provide other benefits such as educational events or occasional business entertainment for our supervised persons. In evaluating whether to recommend or require that Clients custody their assets at Schwab and/or TD Ameritrade, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab and/or TD Ameritrade, which may create a potential conflict of interest.

Item 13 Review of Accounts

WEALTH MANAGEMENT and INDIVIDUAL PORTFOLIO MANAGEMENT SERVICES

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are regularly monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each Client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the Client's individual

circumstances, the market, political or economic environment.

These accounts are reviewed by: Matt Wright, Chief Investment Officer

REPORTS: In addition to the quarterly statements and confirmations of transactions that Clients receive from their broker-dealer, each Client will be able to obtain reports summarizing account performance, balances and holdings at any time via online secure Client portal.

FINANCIAL PLANNING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning Clients unless otherwise contracted for.

REPORTS: Financial Planning Clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

Item 14 Client Referrals and Other Compensation

Client Referrals

It is SWA's policy not to engage promoters (fka solicitors) or to pay related (i.e., Affiliates) or non-related persons for referring potential Clients to our firm. SWA may recommend that Clients or potential Clients use SWA's Affiliates (as described in [Item 10](#)). SWA's affiliation creates a conflict of interest, as SWA may be incentivized to recommend its Affiliates' services over other broker/dealers, investment advisers and/or insurance agencies. Clients and prospective Clients are not under any obligation to obtain professional services or products (of any kind) from any of SWA's Affiliates or the Affiliates' financial professionals.

While SWA does have benefit arrangements (as described in [Item 10](#) from DFA and [Item 12](#) from Schwab and TD Ameritrade), it is SWA's policy not to accept or allow our staff to accept any form of compensation, including cash, sales awards or other prizes from those entities in conjunction with the advisory services we provide to our Clients.

Other Compensation

SWA's supervised persons are employees of a subsidiary of Avantax, Inc. and are compensated through base salaries and other employee benefits. Some of SWA's supervised persons may also receive a discretionary bonus based on a portion of revenue or assets under management of SWA, its Affiliates or both. Such compensation varies but is not based on the type of investments that are recommended to SWA's Clients.

Item 15 Custody

Under specific Client agreements, SWA is authorized to provide online access to held-away accounts in order to monitor changes in market value and implement investment management strategies or rebalance the portfolio (i.e., trade in the account). Under this first scenario, SWA has an obligation to contract with an approved public accounting firm to conduct an external annual

surprise exam of these activities. Additionally, SWA accepts standing letters of authorization, directed by individual Clients to pay third parties on their behalf, and has the ability to have its fees for each Client debited by the custodians. .

As part of this billing process, the Client's custodian is advised of the amount of the fee to be deducted from that Client's account. On at least a quarterly basis, the custodian is required to send to the Client a statement showing all transactions within the account during the reporting period. Because the custodian does not calculate the amount of the fee to be deducted, it is important for Clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact SWA directly if they believe that there may be an error in their statement.

In addition to the periodic statements that Clients receive directly from their custodians, we also send account performance statements directly to our Clients on a quarterly basis. We urge our Clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

Item 16 Investment Discretion

Clients may hire SWA to provide discretionary asset management services, in which case we place trades in a Client's account without contacting the Client prior to each trade to obtain the Client's permission.

Our discretionary authority includes the ability to perform the following without contacting the Client:

- determine the security to buy or sell; and / or
- determine the amount of the security to buy or sell; and / or
- determine the broker or dealer to be used for a purchase or sale of securities for a Client's account; and / or commission rates to be paid to a broker or dealer for a Client's securities transactions.

Clients give SWA discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may also change or amend such limitations by providing us with written instructions. Client restrictions can affect the account's performance.

Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of Clients. Therefore, although our firm may provide investment advisory services relative to Client investment assets, Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the Client's investment assets. Clients are responsible for instructing each custodian

of the assets to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. Generally, Clients will receive proxy materials directly from the applicable custodian(s) or issuer's proxy agent and should direct any questions as instructed in the specific proxy matter.

Item 18 Financial Information

SWA does not require or solicit prepayment of fees in excess of \$1,200 per Client more than six months in advance of services rendered. SWA has no financial commitment or condition that is reasonably likely to impair its ability to meet contractual commitments to its Clients. SWA has not been the subject of a bankruptcy petition.