

**WRAP FEE PROGRAM BROCHURE**

Item 1 Cover Page

**ETFidea, LLC**  
**100 Madison Street, Suite 1200**  
**Syracuse, NY 13202**

**315-472-6221**

**[www.etfidea.com](http://www.etfidea.com)**

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This wrap fee program brochure provides information about the qualifications and business practices of ETFidea, LLC. If you have any questions about the contents of this brochure, please contact us at 315-472-6221 or by email at [wkriesel@etfidea.com](mailto:wkriesel@etfidea.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about ETFidea, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Material Changes

There are no material changes to this brochure from prior brochures. Therefore, this Item is not applicable.

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#### **Item 4 Services, fees and compensation**

ETFidea, LLC is a registered investment advisor which has been established to allow our portfolio managers to offer you this program, and also to allow our IARs to provide you with financial plans or other planning services at a separate fee.

##### Fee Structure

The fee structure for your ETFidea account will be wrap based, where you will pay a quarterly fee based on the assets under management. The quarterly fee will be automatically withdrawn in advance of each calendar quarter. For accounts with less than \$100,000, there will also be a quarterly administrative fee in the amount specified below. The fees, on an annual basis, will not exceed:

Asset Base	Annual Fee	Quarterly Administrative Fee
Up to \$99,999	2.50%	\$100
\$100,000 – \$300,000	2.25%	None
\$300,001 - \$500,000	2.00%	None
\$500,001 - \$750,000	1.75%	None
\$750,001 - \$1,000,000	1.50%	None
Over \$1,000,000	1.00%	None

You may enter into a contract with your portfolio manager for less than, but not more than the above amounts. The above fees are used to compensate ETFidea, LLC and your independent advisor representative. All costs of executing trades, including commissions on stock purchases, loads on fund purchases and spreads

on bond purchases will be absorbed by ETFidea, LLC. You will be responsible for internal expenses of ETFs and/or mutual funds in your account.

The ETFidea account is managed by a portfolio manager, whose responsibility is primarily asset allocation. This is due to the investment vehicle that is generally being used, Exchange Traded Funds. ETFs are primarily passive investments, tracking various indexes or sectors. The individual ETF investments do change when the underlying index or measuring factor changes, however they are not generally actively managed. You have chosen the portfolio manager for your portfolio, and that manager will not be subject to performance reviews by ETFidea or any third parties arranged through ETFidea. It is your responsibility to monitor performance of the manager selected by you, and inquire of them as to their particular strategy for selecting portfolios. Generally, the portfolio managers who have selected the ETFidea investment strategy will utilize asset allocation and risk tolerance analysis to determine diversified portfolios.

A wrap program may result in higher or lower costs than purchasing such services separately, with the main factors in determining the cost difference being the activity of the trading and the amount of planning services which would be charged on another basis, such as hourly or agreed upon for a specific project.

Our clients will not be charged any additional trading costs other than costs which are mandatorily passed through to the clients. In addition, the ETFs or funds chosen will have underlying costs which will be borne by the client.

ETFidea has entered into solicitor agreements with other individuals. When a solicitor refers a client to ETFidea, the solicitor is compensated. In all cases where a solicitor is compensated, full disclosure is given to the client including who is being compensated, and how much they are compensated.

The following is the standard solicitor payment schedule, but again each arrangement is specifically disclosed to any client in which a solicitor is compensated.

<b>Initial Account Value</b>	<b>Standard Solicitor Fee Schedule</b>
Up to \$99,999	0.00%
\$100,000 - \$299,999	.50%
\$300,000 - \$499,999	.50%
\$500,000 - \$749,999	.50%
\$750,000 - \$999,999	.40%
Over \$1,000,000	.25%

#### **Item 5 Account requirements and types of clients**

ETFidea services are available to individuals, pension and profit sharing plans, and other business entities.

The minimum account size for ETFidea accounts is \$25,000. ETFidea reserves the right to negotiate minimum account size, and may aggregate accounts to determine the requirement.

## **Item 6 Portfolio manager selection and evaluation**

All persons responsible for giving investment advice will be required to have a high school degree and licensure or certification as a series 7 general securities representative, certified financial planner, certified public accountant, attorney, life insurance agent or similar license or certification. The portfolio manager will be selected by the client.

## **Item 7 Client information provided to portfolio managers**

As the client selects the portfolio manager, all information about the client is provided by the client to the portfolio manager.

Portfolio managers may introduce advisory clients to money managers, timing services or other investment advisory firms. These sponsors provide reporting, monitoring and review services as described in their respective contracts with the client. For clients receiving investment advisory services from ETFidea and/or the portfolio manager, clients are informed that should their investment objectives change during the course of their investment program, they should notify ETFidea or their portfolio manager. This notification will trigger an account review. ETFidea will provide portfolio managers with risk analysis questionnaires designed to assess a given clients risk tolerance to determine appropriate portfolio designs. ETFidea will also provide portfolio managers with suggested portfolio mixes based on risk assessment. The determination of suggested portfolio mixes will be made by the owners of ETFidea. Final portfolio determination will be made by the portfolio manager and the client.

The only information about you which will be furnished to the mutual fund companies, brokerage houses, etc. will be identifying information required to maintain accounts. Your risk analysis and goals will be maintained by your portfolio manager and ETFidea, LLC. Some ETFidea accounts may hold other individual securities, at the discretion of the portfolio manager.

#### **Item 8 Client contact with portfolio managers**

Our clients have complete access to their portfolio managers during normal business hours.

You will not be able to contact the managers of mutual fund or ETF positions other than through their normal channels. The account will have individual ETFs selected by your portfolio manager.

#### **Item 9 Additional information**

There are no disciplinary actions to disclose.

ETFidea does not guarantee the future investment performance of the client's account, or the success of any specific investment strategy or overall management of the client's investment portfolio. Any investments utilizing equity or other security transactions can result in loss.

As a fiduciary, ETFidea endeavors to act in the best interest of its clients.