

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

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This brochure provides information about the qualifications and business practices of Strategic Wealth Management Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at 850-383-0001. 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 Strategic Wealth Management Advisors, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Strategic Wealth Management Advisors, Inc has made no material changes since its last brochure update March 31, 2010.

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Item 4 Advisory Business

Strategic Wealth Management Advisors, Inc. (“The Adviser”, or “SWMA”) was founded in 2005 by Todd C. Hunter, Sr., who serves as President, Principal, Chief Compliance Officer and Portfolio Manager. Hunter was joined in September of 2005 by Carl Monson, who serves as Principal and Portfolio Manager. The Adviser provides portfolio management for clients through discretionary and non-discretionary accounts. The Adviser focuses primarily on individuals, trusts, estates, charitable organizations, foundations, corporations and other business entities with the following types of investments:

- Equity securities (exchange listed, over-the-counter, and foreign issuers)
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposits
- Municipal securities
- U.S. government securities
- Mutual Funds
- Exchange Traded Funds (ETF’S)
- Alternative Investments
- Options contracts on securities
- Warrants
- Investment company securities (variable life insurance, variable annuities).

Strategic Wealth Management Advisors, Inc. provides Investment Supervisory Services, defined as giving continuous advice to a Client and/or executing investments for a Client based on the individual needs of the client. Through personal discussions, the adviser develops goals and objectives based upon a Client’s investment time horizon and risk tolerance, as well as their circumstances and core financial-related values. SWMA assists the Client in developing the Client’s personal investment strategy, and then creates and advises and manages a portfolio based on that strategy. SWMA can also select other advisors (including private fund managers) to manage client assets, of which an additional fee will be charged by the selected advisor for his services.

SWMA is paid for services rendered by charging a percentage of assets under management, a fixed fee (other than subscription fees) or an hourly charge (not to exceed \$150.00 an hour). All charges and fees are negotiable.

As of February 28, 2011, the Adviser had the following in assets under management:

| | | |
|-----------------------|---------------|---------------|
| Discretionary: \$ | 36,207,192.00 | Accounts: 203 |
| Non-Discretionary: \$ | 5,005,770.00 | Accounts: 189 |
| Total Assets: \$ | 41,212,962.00 | Accounts: 392 |

Privacy Notice

Strategic Wealth Management Advisors, Inc. is a registered investment adviser committed to safeguarding your personal information. We are required to collect certain personal information about you as a normal course of doing business. This notice describes how we collect information about you, under what circumstances we may disclose the information to others, and how we safeguard your information in our possession.

Information We Collect

We collect and use information about you in order to provide you with our financial products and services. We obtain most information directly from you when you open an account or purchase financial products or services from us. We may also obtain information about you from our representatives and their affiliated businesses, and from third parties such as retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies, your former broker-dealer or its registered representative, clearing firms, or others who provide you with financial products or services. This may include information such as your name, address, telephone number, social security number or other tax identification number, date of birth, assets, income, net worth, financial goals,

occupation, beneficiary designations and other information from your application.

Information We Disclose

We may disclose information about you, as described above, to our staff, affiliates, representatives, their affiliated businesses, and nonaffiliated third parties who provide you with financial products and services. These nonaffiliated third parties may include retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers, third party money managers, and clearing firms.

Our privacy notice is the same for current, as well as former clients. Also, if you close your account, in the process of transferring your investments we may share your information with the new broker-dealer or custodian that you or your representative selects. We may disclose information such as your name, address, social security number, date of birth, transactional information, or other financial information when necessary for us to provide you with financial products and services or report on your account, or where law prescribes disclosure. For example, we report your tax-related information to federal and state governments, and we may disclose information during the course of an audit or to law enforcement or regulatory agencies.

We do not disclose your information to nonaffiliated companies who intend to market their products to you. However, we may share your personal information with companies that we hire to perform services for us, such as vendors that provide data processing and storage, computer software maintenance and development, transaction processing, or other administrative duties on an as needed basis only.

“Opting-out” of Third-Party Disclosures

If you do not want us to share your information (other than as prescribed by law), you may contact our Compliance Department.

Special Note for California and Vermont Accounts

Vermont and California law impose additional requirements beyond federal law for residents of those states. Consistent with these laws, we do not share information with third parties for accounts with a primary mailing address in those states except as required or permitted by applicable federal and state law.

Securing Your Information

We are committed to protecting the privacy and confidentiality of your personal information. Only those employees who need to have access to personal information to perform their jobs are authorized to use your personal information. They may need access to your personal information to conduct business on your behalf, service your account, help you pursue your financial objectives, and to conduct our business.

Employees who have access to your personal information are required to maintain and protect the confidentiality of that information and must follow established procedures. We maintain physical, electronic and procedural safeguards reasonably designed to protect your personal information and to comply with applicable laws and regulations.

Questions

If you have questions about our privacy notice, you may contact our Compliance Department. We appreciate your business and look forward to serving your financial service needs.

Item 5 Fees and Compensation

The Adviser offers clients portfolio advisory services and management through discretionary and non-discretionary accounts. SWMA is paid for services rendered by charging a percentage of assets under management, a fixed fee (other than subscription fees) or an hourly charge (not to exceed \$150.00 an hour). All charges and fees are negotiable.

Clients whose assets are invested with third party money managers may be paying two advisory fees; an advisory fee to SWMA and an additional fee to the third party money manager.

SWMA's minimum account size is \$100,000. Client's who are charged a fixed fee based on assets to be managed will be charged according to the following schedule.. The Schedule that follows is established as a guideline.

| Account Value | Fee |
|-------------------------|--------|
| \$ 100,000 - \$ 500,000 | 1.5% |
| 500,000 - 1,000,000 | 1.25 % |
| 1,000,000 - 3,000,000 | 1.00 % |
| 3,000,000 - 5,000,000 | 0.75 % |
| 5,000,000 - 7,500,000 | 0.65 % |
| 7,500,000 + | 0.50 % |

The established Fee Schedule is subject to change as determined by the total scope, complexity, and/or volume of services specified as required by the client for each account. The minimum account fee charged will not be less than 0.50% and will be no more than 2.5%. For accounts invoiced in arrears on a quarterly basis, 1/4 of the agreed upon annual advisory/management fee is multiplied by the total asset value to be managed using the month ending balance of the last month of each ending quarter. Accounts invoiced on a monthly basis, 1/12 of the agreed upon annual fee will be multiplied by the month ending asset value to be managed. **Note: Currently SWMA has no accounts with a monthly option.**

All fees and charges are negotiable and will be invoiced after investment services have been performed.

Securities are held in an account in which an asset-based fee, a fixed fee or hourly fee is charged. Depending upon the level of service desired and the expected extent of transactions, lower cost alternatives may be available but not necessarily with SWMA.

The client will be permitted to cancel the investment agreement at any time with written notice.

The Custodian may charge other types of transaction based fees or charges such as Processing Fees and Postage and Handling Fees. In addition, Service charges may also be imposed by the Custodian for specific account services. All of these types of charges are completely separate from the Adviser. See the "Brokerage Practices" section for more information.

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

Strategic Wealth Management Advisors, Inc. does not have performance-based fees or utilize side-by-side management. The only fees charged to client are noted in the “Fees and Compensation” section.

Item 7 Types of Clients

The Adviser has the following types of clients:

- Individuals
- High Net Worth Individuals
- Pension and profit sharing plans
- Trusts
- Estates
- Charitable Organizations
- Foundations
- Corporations or business entities not listed above

SWMA has a minimum account size of \$100, 000.00. Accounts may be accepted on a negotiated basis at the discretion of the Adviser.

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

Methods of Analysis

The Adviser uses the following methods of analysis in its Client accounts:

- Fundamental
- Technical
- Cyclical

Fundamental analysis examines:

- all the material factors of the security,
- the company,
- industry in which the company operates, and
- the economy

Technical/Cyclical analysis examines the supply and demand of the securities as evidenced by market activity.

The Adviser receives research from a variety of sources, including available for public viewing such as:

- Financial newspapers and magazines
- Inspection of corporate activities
- Research materials prepared by others
- Corporate rating services
- Annual reports, prospectuses, filings with the Securities Exchange Commission, and Company press releases

Investment Strategies

The Adviser typically employs the following types of investment strategies:

- Long term purchases (held for more than a year)
- Short term purchases (held for less than a year)
- Trading (held for less than 30 days)
- Margin transactions
- Option writing, including covered options, uncovered options, or spreading strategies

SWMA typically offers the following types of investments:

- Equity securities (exchange listed, over-the-counter, and foreign issuers)
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposits
- Municipal securities
- Investment company securities (variable life insurance, variable annuities, and mutual fund shares)
- U.S. government securities
- Options contracts on securities

Risk of Loss

The potential risks of using Fundamental analysis are that the IAR is using historical information, which may not predict the future outcome of a security. The potential risks of using Technical/Cyclical analysis are the quality of

the information being used to support the analysis and no expectation of a change to a cycle.

Clients investing in securities should be aware of the risks involved. Each investment strategy may entail unique risks including the possibility of incurring a loss. In a long term investment strategy, returns may be adversely affected by market downturns or inflation. A short term investment strategy is susceptible to current market volatility.

Item 9 Disciplinary Information

Strategic Wealth Management Advisors, Inc and its investment adviser representatives (“IARs”) do not have any disciplinary history.

Item 10 Other Financial Industry Activities and Affiliations

SWMA has two (2) IARs: Todd C. Hunter, Sr. and Carl G. Munson. The following individual has other financial industry activities and affiliations as noted below.

Todd C. Hunter

Securities Brokerage

Mr. Hunter is also a Registered Representative of Dalton Strategic Investment Services, Inc (“Dalton”). IARs or related persons, in their individual capacity as Registered Representatives may be paid fees and/or commissions on securities transactions.

Commission charges may vary depending upon any number of factors, including type of security, purchase or sale, secondary market price, volume of trading, market float, and traded or listed exchange. The Adviser believes that commissions charged by Dalton are competitive with other full service broker-dealers and that they are fair and reasonable. Commissions charged by, while generally competitive, are not necessarily the lowest in the industry. Brokerage transactions are placed only through Dalton.

Insurance Broker/Agent

Mr. Hunter may have insurance company affiliations from which he may receive commissions. Clients are under no obligation to execute recommendations relating to insurance through the Adviser.

Strategic Benefits Consulting Group, Inc.

Mr. Hunter is the President and Owner of Strategic Benefit Consulting Group, Inc., which has insurance company affiliations. He may receive compensation from this company. While insurance products may be available to Clients through this company, Clients are under no obligation to use these services.

Mr. Hunter spends approximately 10% of his time on the above activities. Approximately 8% of this time may be during market hours.

Pursuant to Rule 204A-1 under the Advisers Act, Strategic Wealth Management Advisors, Inc. has adopted a Code of Ethics. Strategic Wealth Management Advisors, Inc. monitors the personal securities transactions of its employees, officers and investment adviser representatives. The Code of Ethics ("COE") set forth standards of conduct and addresses potential conflicts of interest among its personnel and advisory clients. All investment advisory clients may request a copy of the Strategic Wealth Management Advisors, Inc. Code of Ethics by contacting 850-383-0001. The COE ensures the following:

- The interests of the Advisory clients must be placed first at all times. Access Persons must avoid serving their own personal interests ahead of the interests of the Adviser's clients.
- Conduct all personal securities transactions in full compliance with the COE.
- Access Persons must comply with applicable federal and state laws.
- Access Persons must avoid taking inappropriate advantage of the Access Person's position.

There may be occasions in which employees of the Adviser buy or sell securities that it also recommends to clients. This may create a conflict of interest between the Adviser and clients. However, the Adviser has put policies and procedures into place to ensure that the client's interests always come first.

Item 12 Brokerage Practices

The Adviser primarily uses Schwab Institutional, a subsidiary of Charles Schwab and Company, Inc., but may also use other custodians. Clients may use a Custodian of their choice and have no obligation to utilize the custodian recommended by SWMA. However, the Adviser will retain the right not to accept the account.

The Custodian may have their own fee and cost schedules they are entitled to as a Custodian of the account. These fees and costs are completely independent of the Adviser, and the Adviser does not receive any portion of these collected costs.

There are additional transaction charges per trade imposed by the Custodian. This may vary between the Custodians that the Adviser uses. A current fee schedule will be provided by the Custodian at the time the account is opened. The client may also incur charges for other account services provided by the Custodian not directly related to the execution and clearing of transactions including, but not limited to, IRA custodial fees, safekeeping fees, interest charges on margin loans, and fees for legal or courtesy transfers of securities.

The Custodian is obligated to seek best execution for all trades; however, better executions may be available via another Custodian based on a number of factors including type of security, volume, order flow, and market making activity. By executing transactions with the Custodian, it is not guaranteed that a client will receive the most favorable execution of their trades, which in turn may cost clients more money.

The Adviser does not have any soft dollar arrangements.

The Adviser may aggregate sale and purchase orders of securities held by the Adviser's clients with similar orders being made simultaneously for other clients if such aggregation is reasonably likely to result in overall economic benefit to clients based on an evaluation that the clients are benefited by relatively better purchase or sale prices, lower commission expenses or beneficial timing of transactions, or a combination of these and other factors. In some instances, the purchase or sale of securities for clients will be effected simultaneously with the purchase or sale of like securities for other clients. Such transactions may be made at slightly different prices, due to the volume of securities purchased or sold. In such event, the average price of all securities purchased or sold in such transactions is determined and the client may be charged or credited, as the case may be, the average transaction price. This may be of cost to clients depending on the size of potentially aggregated orders.

Item 13 Review of Accounts

Client portfolios are reviewed at intervals not less than once each month and could be as often as daily. Reviews will be conducted by a member of the firm's Investment Committee (Carl G. Monson or Todd C. Hunter). Reviews will ensure adherence to the fundamentals of in which client funds are invested per client goals, objectives and risk tolerance. Special reviews not involving all accounts can be triggered by one or more of the following:

- A change in investment objectives, financial situation and/or guidelines
- Diversification
- Tax considerations
- Contributions or withdrawals of cash from an account
- Purchase or sale of a security
- A determination to change the cash level of an account
- A client's pledge of the assets of an account as collateral security, and
- Requirements imposed by court order or regulatory decree (e.g. divorce decree, tax lien)

Clients receive a confirmation of each transaction and quarterly statements from the Custodian. The Adviser will provide a quarterly report of all managed assets held in the portfolio listing all security holdings, their original total and per share cost and their quarter ending market price and total market value.

Item 14 Client Referrals and Other Compensation

The Adviser does not pay for or receive compensation for client referrals.

SWMA may have the opportunity to receive traditional “non-cash benefits” from the custodians it uses. As part of its fiduciary duties to clients, the Adviser endeavors at all times to put the interests of its investment advisory clients first. Clients should be aware, however, that the receipt of non-economic benefits by the Adviser or its related persons in and of itself creates a potential conflict of interest.

Item 15 Custody

The Adviser does not have custody of client's assets.

Item 16 Investment Discretion

The Adviser has limited discretionary authority to determine what securities a client may hold and in what amount. This authority is granted in writing by the client for each account via a discretionary asset management agreement. This authority does not allow the Adviser to take possession of client funds or securities.

Item 17 Voting Client Securities

Strategic Wealth Investment Advisors, Inc. as a matter of policy and as a fiduciary to our clients has responsibility for voting proxies for portfolio securities consistent with the best economic interests of the clients. While the Adviser does vote proxies for clients, if a conflict of interest arises, the Adviser will disclose such fact to the client and allow the client the opportunity to vote their own proxies if they so choose.

As a routine practice, the Adviser will vote all proxies in the same manner for the same issuer unless precluded by a client. Moreover, it will vote in favor of routine corporate housekeeping proposals such as election of directors or selection of auditors assuming there are not conflicts. The Adviser will typically vote against proposals which cause the board members to become more entrenched or create unequal voting rights. The Adviser will consider the opinion of management, the effect on management, the effect on the shareholder value, and the issuers business practices in making its decision.

SWMA maintains written policies and procedures as to the handling, research, voting and reporting of proxy voting and makes appropriate disclosures about the firm's proxy policies and practices. The Adviser's policy and practice includes the responsibility to monitor corporate actions, receive and vote client proxies and disclose any potential conflicts of interest as well as making information available to clients about the voting of proxies for their portfolio securities and maintaining relevant and required records. For additional information regarding proxy voting policies and procedures, contact the Adviser at 850-383-0001.

Item 18 Financial Information

The Adviser does not have custody of client's assets. It does not solicit payments of \$500 per client or more six (6) months in advance for services. The Adviser has not been subject to bankruptcy and knows of no reason that its financial condition would be impaired in meeting its contractual obligations to clients.

Item 19 Educational and Professional Experience

Strategic Wealth Management Advisors, Inc. has over 70 years of combined financial services industry experience in its two Investment Advisor Representatives. Below are their education and professional backgrounds. Todd Hunter supervises all IAR's activities at the firm. Any questions may be directed to him at 850-383-0001.

Todd C. Hunter YOB: 1957

Mr. Hunter received his A.A. degree from Tallahassee Community College in Tallahassee, FL., and his B.S. degree from Florida State University in Tallahassee, FL., with a major in Risk Management/Insurance from their Business School. He has over thirty years of experience in the financial services industry. Mr. Hunter has worked for some of the largest companies on Wall Street and has been responsible for over half a billion dollars of client investments. He has worked as a financial consultant and manager being responsible for investment management, operations, compliance, adviser oversight, and business development. Mr. Hunter is active in local civic and service organizations such as serving as President of Tallahassee Community College Foundation, serving as director of their Investment Committee and a director of Rotary Club. He holds the following FINRA licenses: Series 7, General Securities; Series 63 Uniform State Law; Series 24 General Securities Principal; Series 53 Municipal Securities Principal; Series 9 General Sales Supervisor; Series 10 General Sales Supervisor. In order to obtain these licenses, a person must study and pass a rigorous examination for each license. Mr. Hunter founded Strategic Wealth Management Advisors, Inc. in 2005.

Carl G. Monson YOB: 1941

Mr. Monson received his B.A. from Stetson University in Deland, FL., with a major in Education. Additionally, he successfully passed 16 hours of Graduate School at Stetson and the University of Florida. He is a graduate of Florida Bankers Association Trust School where he also served as an instructor. Mr. Monson has over forty years of experience in the financial services industry. He has worked as a Trust Officer, Vice President and Trust Officer and Investment Manager. He has been responsible for trust operations and managed as many as 50 employees in one of the largest cities in the State of Florida. He has been responsible for, in addition to Trust Operations, business development, trust and estate administration, investment management (including the research and implementation of portfolio strategies) for various account objectives for individual accounts, charitable trusts and retirement accounts. Mr. Monson is active in local civic and service organizations such as serving in leadership positions as a director or officer in the Tallahassee Regional Area Estate Planning Council, the Economic Club of Florida and appointed to the City of Tallahassee Investment Advisory Committee and Sinking Fund Committee. He has previously held the FINRA Series 7 General Securities and Series 63 Uniform State Law licenses and currently holds the Series 66 Investment Advisor State Law license. In order to obtain these licenses, a person must study and pass a rigorous examination for each license. Mr. Monson joined Strategic Wealth Management Advisors, Inc., in September of 2005.