



## Securus Wealth Management, LLC Form ADV, Part 2A Brochure

This Brochure provides information about the qualifications and business practices of Securus Wealth Management, LLC. If you have any questions about the contents of this Brochure, please contact us at 763-231-7886 or [info@securuswealth.com](mailto:info@securuswealth.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 Securus Wealth Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Securus Wealth Management, LLC is 138919

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*Registration does not imply a certain level of skill or training.*

Version Date: March 23, 2015

## **MATERIAL CHANGES**

### **Annual Update**

The Material Changes section of this brochure will be updated annually or anytime a substantial material change occurs since the previous release of the Firm Brochure.

### **Material Changes Since the Last Update**

The last annual update of ADV Part 2A was on March 31, 2014.

Since our last update:

Effective May 1, 2015, Securus will no longer be using Schwab Institutional Services as one of our custodians. Accounts currently held at Schwab will begin to be transitioned to one of our other preferred custodians, either Fidelity Institutional Wealth Services or TD Ameritrade Institutional.

### **Full Brochure Available**

Securus Wealth Management will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting us at 763-231-7880 or [info@securuswealth.com](mailto:info@securuswealth.com).

Additional information about Securus Wealth Management is also available via the SEC's web site [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Securus Wealth Management who are registered, or are required to be registered, as investment advisor representatives of Securus Wealth Management.

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## ADVISORY BUSINESS

### **Description of Advisory Firm**

Securus Wealth Management, LLC (“SWM”, “We”, “Our”, or “Us”) is a privately owned Limited Liability Corporation headquartered in Plymouth, MN. SWM is a federally registered investment advisor (RIA) with the Securities and Exchange Commission (SEC).

SWM was started in 1994 by James Goodland and was previously known as The Financial Resource Group. In December 2005 we changed our name to Securus Wealth Management, LLC and registered as an investment advisor with the State of Minnesota. In January 2006, SWM registered as an investment advisor with the SEC. Currently, James Goodland is the only equity owner.

Assets under the direct management of Securus Wealth Management, LLC, are held in the client’s name by independent custodians, including Fidelity Institutional Wealth Services, TD Ameritrade Institutional, Pershing, National Financial Services, Genworth Financial.

We may recommend other professionals (e.g., lawyers, accountants, insurance agents, real estate agents, etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis even when recommended by SWM.

### **Advisory Services Offered**

Individuals associated with SWM provide its investment advisory services. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on behalf of SWM. Such individuals are known as Investment Adviser Representatives (“IARs” or “advisor representatives”). SWM offers the following services to advisory clients:

### **Financial Planning**

If you decide to sign up for financial planning services you will be required to execute a Financial Planning Engagement. Upon execution of the engagement, your SWM IAR will provide investment advisory services in the form of written financial planning and consulting services.

Financial planning services may take into consideration your objectives, overall financial situation, personal and financial goals, risk tolerance and objectives, risks that you are willing to undertake, investment knowledge, net worth, income, age, projected retirement, unusual or material funding requirements, inheritance possibilities, pensions, social security, children/relative funding issues, estate issues, and living expenses expressed in today's dollars requested for retirement.

Based on the previous data and information compilation, financial planning recommendations are made based on your individual needs. Topics included as part of financial planning services provided may include, but are not necessarily limited to, one or more of the following:

- Portfolio Review and Evaluation
- Retirement Account Analysis
- Cash Flow and Net Worth Analysis
- Risk Management Analysis
- Budgeting
- Planning for Family Member Special Needs
- Divorce Planning
- Developing a Comprehensive Written Financial Plan
- Retirement Planning

- Consulting with Qualified Plan Sponsors
- Education Funding Planning
- Review of Medical, Disability, and other insurance
- Estate Analysis and Planning
- Financial Planning and Education Seminars
- Negotiation of the Purchase of Substantial Assets (I.E. Home, Auto, Vacation Residence, Etc.)

Depending on the complexity, financial planning fees can be charged as a flat fee or on an hourly basis. Fees are negotiable and may be separate from SWM's INVESTMENT ADVISORY fees. For more information regarding these fees, please see **Item 5 – Fees and Compensation**

### **Asset Management**

Our Investment Advisor Representatives may provide advisory services in the form of asset management services. Asset management services involve providing clients with continuous and ongoing supervision over client accounts. This means that SWM IRAs continuously monitor a client's account and make trades in client accounts when necessary.

### **Use of Third Party Money Managers**

SWM IARs may direct clients to outside, or unaffiliated, money managers that are registered or exempt from registration as investment advisors. Third-party money managers are responsible for continuously monitoring client accounts and making trades client accounts when necessary.

### **Specialization**

Investment strategies and philosophies differ among SWM Advisor Representatives who are responsible for determining and implementing their own investment advice under the supervision and compliance controls of SWM. While SWM does not consider itself as specializing in anyone form of advisory service, SWM IARs may focus or specialize on certain types of advisory services over other types. The following are some of the general areas our IARs may focus upon.

- Financial planning
- Investment Management
- Investment Consulting Services
- Recommendations of Third Party Money Managers

### **Tailored Relationships**

At SWM, services are always tailored to the individual needs our clients. Clients may impose restrictions on their accounts including investing including specific investment selections and sectors. This must be done in writing and be signed by the client. Agreements may not be assigned without client consent.

### **Assets Under Management**

As of 03/23/2015, SWM managed approximately \$117,714,197 in assets. Approximately \$108,745,248 is managed on a discretionary basis, and \$8,968,949 is managed on a non-discretionary basis. SWM's IARs also oversee approximately \$65,000,000 outside of the registered investment advisor through the IAR's registered representative status with NFP Advisor Services, a federally registered broker/dealer member SIPC.

## Business Continuity Plan

SWM has established a Business Continuity Plan (BCP). The BCP describes how SWM responds to significant business disruptions and provide investors with alternative contact information in the event of a significant business disruption. The BCP Summary available upon written request.

## FEES AND COMPENSATION

### Investment Advisory Fee Schedule

Securus Wealth Management bases its fees on a percentage of assets under management, hourly charges, fixed fees, or a retainer that is not calculated on an assets under management (AUM) basis or on an hourly estimate. All fees are negotiable.

Investment advisory fees are generally billed on a sliding scale according to the schedule below:

<b>Assets Under Management</b>	<b>Annual Fee</b>
The first \$250,000	1.75%
\$250,000 to \$500,000	1.50%
\$500,001 to the first \$1,000,000	1.25%
The next \$1,000,001 to \$2,000,000	1.00%
The next \$2,000,001 to \$5,000,000	0.75%
The next \$5,000,001 to \$10,000,000	0.65%
\$10,000,001 and above	0.50%

A one-time account set-up fee and Investment Policy Statement (IPS) design of \$500 per account (maximum of \$1,500), will be charged upon engagement.

Securus IAR's can modify this fee schedule based on individual circumstances that may result in a different fee schedule than shown above. Any alterations to the above fee schedule are required to be in writing between the client and SWM, as reflected in the SWM fee agreement, prior to any fees being charged.

### Calculation and Payment

Advisory fees are normally charged quarterly in advance. The number of days in the quarter is divided by 365. This figure is multiplied by the annual fee. This fee factor is then multiplied by the account balance as of the last business day of each quarter.

Additional assets deposited into a client's account after it is opened or after the quarterly billing date, may be charged a pro rata fee based upon the number of days remaining in the current calendar quarter. No fee adjustments will be made for partial withdrawals. If an account falls below the minimum account size requirement determined by the IAR, SWM reserves the right to terminate advisory services.

Advisory fees will be withdrawn directly from the client's account held by an independent custodian. The custodian withdraws the advisor fees from the client's account based on our instruction. At least quarterly, the custodian will send an account statement directly to the client indicating the amounts disbursed from the account including the amount of advisory fees paid to SWM.

For those clients who choose not to have advisory fees withdrawn directly from their accounts, payment of advisory fees is due upon receipt of SWM's billing invoice. The invoice will include the account value, fee calculation, and amount due.

All fees paid to Securus Wealth Management, LLC for financial planning and advisory services are completely separate and distinct from the transaction fees, custodial fees, transfer fees and expenses charged by the custodian or Mutual Fund Company. These fees and expenses are deducted directly from the client's account and go directly to the custodian or Fund Company. SWM does not receive any portion of these fees.

### **Financial Planning Fee Schedule**

Our Investment Advisor Representatives will generally provide one of three basic types of financial planning services as follows:

1. Full Financial Plan Fee: This service provides for the creation of a holistic written financial plan.
2. Review and Update Financial Plan Fee: This service provides for ongoing review of and/or updates to a written financial plan on either a quarterly, semi-annual or annual basis.
3. Limited Scope Planning Services Fee: This service provides for limited scope services that focus on one or more separate specific areas but do not involve the creation of a full financial plan.

In addition to providing written financial plans, SWM IARs can provide financial planning consultation services. Consultation services are provided focusing on your specific areas of concern. These services can also include retirement plan consulting services provided to a plan sponsor or to an individual client wanting advice on how their plan investments should be allocated. SWM IARs may also provide financial planning services to business entities and groups requesting educational services and financial planning seminars or individual consulting and planning services to be provided to employees or members. If individual planning or consulting services will be provided, each participating employee or member will be required to execute a separate agreement with SWM.

Financial planning services do not include the implementation of transactions on your behalf. To the extent you would like your SWM IAR to implement transactions on your behalf, you will need to contract with your SWM IAR for one or more of the management services described later in this section of the Disclosure Brochure or you could work with your SWM IAR in his or her separate capacity as a NFP Registered Representative to establish a brokerage account and implement transactions through a non-fee, commission-based brokerage account. A conflict will exist between the interests of SWM and our IAR and your interests. If you choose to implement the advice of your IAR, he or she may earn commissions in his or her capacity as a Registered Representative or additional advisory fees for managed accounts in addition to the fees charged for financial planning services. Fees can be paid in a variety of options determined between yourself and your SWM IAR.



The fee arrangement should be expressed on the appropriate SWM Agreement. These options include hourly Financial Planning.

- **Fixed Fee Services** – The fixed fee will vary depending on a variety of factors, depending on the scope of services provided, complexity of the process undertaken, the types of issues addressed and the frequency with which the services are rendered. Fees charged for financial planning services on a fixed basis generally do not exceed \$25,000.
- **Hourly Financial Consulting** – Client may retain an Investment Advisor Representative to provide financial consulting services. SWM IARs generally do not charge more than \$550 on an hourly basis.
- **Asset Based Fee Agreement** – Clients may retain an Investment Advisor Representative to provide financial consulting services based on assets held outside of SWM. The fee for such services will be a percentage of all assets being managed by the IAR. The total fee may not exceed 2.25% of the assets.

Financial planning fees described above do not include the fees you will incur for other professionals (i.e. personal attorney, independent Investment Adviser, or accountant) in connection with the financial planning process.

The above ranges are the standard fee ranges that are typically charged. In some instances fees higher than those stated above may be charged if the scope of the project agreed upon warrants a higher fee. All fees are negotiable and are agreed upon prior to entering into a contract.

SWM IARs may waive agreed upon financial planning fees and expenses if a client purchases products or enters into agreements for other services with the SWM Advisor Representative. The client and SWM Advisor Representative preparing the financial plan or providing the consultation services will determine the exact fee and the manner in which the fee is to be paid. SWM Advisor Representatives may negotiate fees with each client based on the complexity of the client's personal circumstances, financial situation and the services that will be provided, the scope of the engagement, the client's gross income, the experience and standard fees charged by the SWM IAR providing the services, and the nature and total dollar asset value of the assets that services will be provided on. In addition, fees may be negotiated based on whether or not the client has assets under management with the SWM IRA.

Clients will generally receive their financial plan within 90 days of entering into a financial planning contract, provided that all information needed to prepare the Financial Plan has been promptly provided by the client.

Fees are due upon client's receipt of an invoice from the SWM IAR. If you like, you may authorize fee payment from either a managed brokerage account or from your checking or savings account to pay for financial planning services.

### **Flat Fees**

Basic Financial Plan	From \$750.00
Comprehensive Financial Plan	\$1,500 to \$10,000 depending on scope and complexity

## **Hourly Fees**

\$150.00 to \$550.00 per hour depending on the IAR performing the work.

## **Asset Based Fees**

From .50% to 2.25% of assets being managed

Actual costs are agreed upon in advance and have a 50% minimum paid upon entering the agreement, with the remainder to be paid upon completion of the plan. Financial planning fees are negotiable and may be separate from SWM's investment advisory fees. Prepayment of fees in excess of \$1200 shall not be required more than six months in advance of the work agreed upon between SWM and the client.

## **Concierge and Special Projects Rates**

Projects involving:

Jim Goodland	\$550.00 per hour
Senior Planner	\$200.00 to \$350.00 per hour
Associate Planner	\$150.00 per hour

Estimates are provided and a deposit requested. Since the nature of the work often involves variables or circumstances unknown at the start of the engagement, estimates are not guaranteed.

## **Conflicts of Interest**

The receipt of commission payments presents a conflict of interest and could give us an incentive to recommend investment products based on the compensation we receive, rather than on the client's needs. These types of products could include loaded mutual funds, life insurance, and some annuity products.

SWM may receive compensation for the sale of securities or other investment products, including asset based sales charges or services fees from the sale of mutual funds to its clients. We may recommend these securities as part of a client's overall portfolio strategy. The commissions we receive are separate from and in addition to the fees paid to us for our investment advisory services.

Securities that generate commissions are excluded from the asset values used for calculating fees for investment advisory services. However, advisory fees that are charged are not reduced to offset the commissions or markups on commissionable securities or investment products recommended to clients.

Anytime we would receive a commission from the sale of a recommended investment product, we will disclose that conflict to our clients. Our disclosure may be in conversations with the client or may be in writing. Clients are free to choose whether they act on our recommendations to purchase investment products or not. Clients always have the option to purchase SWM recommended products through other brokers or agents that are not affiliated with SWM.

SWM may direct clients to third party money managers. SWM will be compensated via a fee share from the advisors to which it directs those clients. This creates a conflict of interest in that SWM has an incentive to direct clients to the third party money managers that provide SWM with a larger fee split. SWM will always act in the best interests of the client, including when determining which third party manager to recommend to clients.

### **Termination**

SWM reserves the right to stop work on any account that is more than 60 days overdue. In addition, SWM reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate to providing proper financial advice, per the judgment of SWM.

For all advisory services, either party may terminate the agreement upon thirty (30) days written notice to the other party.

If SWM terminates the agreement, the current management fee will be pro-rated to the notice date and refunded to client.

If the client terminates the agreement or transfers all assets to another custodian or removes SWM as the designated investment advisor with the current custodian, the advisory agreement in force will be deemed terminated without proper notice and no refund of fees will be required. SWM may refund a portion of the current quarterly management fee at our discretion.

If either party terminates the investment advisory agreement, SWM will not liquidate any securities in the account unless authorized in writing by the client. In the event of client's death or disability, we will continue management of the account until an authorized party notifies us of client's death or disability and provides alternative instructions. Upon termination, we instruct the custodian to debit all outstanding unpaid management fees owed from any client that pays separately (via invoice).

## **PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

SWM does not charge performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **TYPES OF CLIENTS**

Securus Wealth Management, LLC provides investment advisory services to individuals, families, trusts, estates, charitable organizations, including foundations and endowments, corporations and other business entities.

### **Account Minimums**

SWM normally requires a new investment account minimum of \$500,000 for investment advisory services. Related household, family and business accounts may be aggregated to meet the minimum, subject to approval by SWM. Occasionally, the minimum may be waived for unique situations or if a client is approaching retirement and has fewer investable assets, but anticipates moving additional assets under management at retirement. Clients are advised that smaller

accounts are more difficult to diversify and rebalance and may not experience the same performance as larger accounts.

Significant funds withdrawal may result in a request for additional fund deposits to continue with the management of accounts.

## **METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

SWM IARs use various methods of analysis and investment strategies. Methods and strategies will vary based on the SWM IAR providing advice. Models and strategies used by one IAR may be different than strategies used by other IARs. SWM has no requirements for using a particular analysis method and SWM IARs are provided flexibility (subject to SWM's supervision and compliance requirements when developing their investment strategies). The following sections provide brief descriptions of some of the more common methods of analysis and investment strategies that are used by SWM IARs.

### **Methods of Analysis**

Security analysis methods at SWM include technical analysis, fundamental analysis, asset class and sector analysis, momentum and supply/demand indicators and other analysis. The main resources for information comes from our investment policy committee's independent research, research reports prepared by outside firms and analysts, Morningstar reports, S&P reports, financial publications and filings with the SEC. Employees and IARs frequently attend on and off-site visits with fund and portfolio managers, related conference calls, webinars and industry conferences.

### **Investment Strategies**

The primary investment strategies SWM's IARs employ is tactical asset allocation which is a less passive way of tactically adjusting portfolios based on current research and analysis. Tactical asset allocation can require the portfolio to be rebalanced as necessary to incorporate the SWM's IAR's best current asset class selections. Portfolios generally consist of exchange traded funds (ETFs), actively managed mutual funds and separate accounts where opportunities exist for the underlying fund manager to make a difference, exchange traded funds and individual stocks and bonds. Portfolios are generally globally diversified to help control the risks associated with traditional markets. IARs also may recommend independent third party managers who display certain expertise and disciplines when appropriate for the client.

The investment recommendations for a specific client is based on each client's independent needs which include objectives, risk tolerance, income needs, tax situation and other material information gathered from the client during consultations. The client may change these objectives at any time. While SWM IARs do employ several model portfolios for analysis, each client's portfolio is constructed independently and may include a combination of SWM's internal models or a completely independent portfolio design

### **Risk of Loss Statement**

Prior to entering into an agreement with SWM, a client should carefully consider:

1. That investing in securities involves risk of loss which clients should be prepared to bear;
2. That securities markets experience varying degrees of volatility; and

3. That over time the client's assets may fluctuate and at any time be worth more or less than the amount invested.

Our investment approach always keeps the risk of loss in mind and while we strive to minimize risks appropriately there are no guarantees against loss of principal. As with all investments, clients may face one or more of the following risks: Loss of Principal Risk, Interest-rate Risk, Market Risk, Inflation Risk, Currency risk, Company Risk, and Financial Risk.

From time to time Securus and/or your Investment Adviser Representative may recommend or invest a small portion of your assets in more speculative investments, including, but not limited to, Pink Sheet or Grey Market securities<sup>1</sup>. Such investments represent a significant risk of loss, up to and including the entire investment amount, due to: stock volatility, thin or no trading volumes, high spread or mark-up rates, lack of a defined market maker, and lack of disclosure requirements. If you are uncomfortable with such risks, please contact your Investment Adviser Representative and invoke your right to place transaction restrictions on your account.

## DISCIPLINARY INFORMATION

We are required to disclose whether there are 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. SWM does not have any legal or disciplinary information to disclose.

## OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

### Registration as Broker-Dealer Representatives

Some of SWM's IARs are Registered Representatives of NFP Securities, Inc. a non-affiliated securities Broker-Dealer and member of FINRA. As such, they may execute securities transactions for clients on a commissioned basis.

### Licensed Insurance Agents

SWM's IARs and associated persons may also be agents of life insurance companies for the sale of insurance products or as independent life insurance brokers, enabled to sell any number of products to their clients. In either case, they would be licensed through their selling company as well as their respective state insurance department(s). Insurance products may be recommended as part of a clients' overall financial plan.

### Other Affiliations

In addition, some of SWM's IARs and associated persons have entered into an Equity Participation Plan with NFP. Under this arrangement, SWM's IARs have the ability to earn a percentage of NFP's overall profit ratio. SWM's IARs are not owners or officers of NFP. However, they are eligible to participate in the Equity Participation Plan due to their affiliation as Registered Representatives of NFP. This arrangement between SWM's IARs and NFP is a potential conflict of interest between

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<sup>1</sup> A Grey Market security is a security that is not currently traded on the OTCQX, OTCQB or OTC Pink marketplaces. Broker-dealers are not willing or able to publicly quote OTC securities because of a lack of investor interest, company information availability or regulatory compliance.

SWM and its clients in that it may inhibit SWM's independent judgment concerning the best execution services offered by NFP.

## **CODE OF ETHICS PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **Code of Ethics**

SWM believes that we owe clients the highest level of trust and fair dealing. Further, as part of our fiduciary duty, we place the interests of our clients ahead of the interests of the firm and our personnel and associated persons. SWM's personnel and associated persons are required to conduct themselves with integrity at all times. SWM will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **Participation or Interest in Client Transactions and Personal Trading**

SWM and its associated persons may trade securities for their own account. These transactions may be the same or similar to transactions they recommend and/or effect for any advisory client. Employees and other related parties may not trade their own securities ahead of client trades.

The Chief Compliance Officer of SWM is James Goodland. Jim reviews all supervised individuals' trades each quarter. His personal trades are reviewed by Chief Operating Officer, Kristen Mueller. The personal trading reviews ensure that the personal trading of employees and other related parties were not based on inside information and that clients of the firm receive preferential treatment.

SWM is and will continue to be in total compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988 and the applicable rules of state and federal securities laws, including the prohibition of insider trading. SWM maintains the required personal securities transaction records for all employees and other related parties.

## **CROSS TRANSACTIONS**

### **Agency Cross Transactions**

Securus Wealth Management's policy and practice is to NOT engage in any agency cross transactions.

An agency cross transaction is defined as a transaction where a person acts as an investment advisor in relation to a transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, acts as broker for both the advisory client and for another person on the other side of the transaction (SEC Rule 206(3)-2(b)). Agency cross transactions typically may arise where an advisor is dually registered as a broker-dealer or has an affiliated broker-dealer.

Agency cross transactions are permitted for advisors only if certain conditions are met under Advisors Act rules including written consent, client disclosures regarding trade information and annual disclosures, among other things.

The Chief Compliance Officer has the overall responsibility implementing and monitoring SWM's policy of not engaging in any agency cross transactions with any of our advisory clients

## **BROKERAGE PRACTICES**

### **Factors Used to Select Custodians and/or Broker-Dealers**

Specific custodian recommendations are made to clients based on their need for such services. SWM recommends custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at reasonable fee rates, and the quality of client service.

### **Research and Other Soft Dollar Benefits**

SWM recommends discount brokerage firms and broker-dealers such as Fidelity and TD Ameritrade. SWM does not receive fees or commissions from any of these arrangements, although SWM may benefit from electronic delivery of client information, electronic trading platforms and other services provided by custodians for the benefit of clients. SWM and our clients may also benefit from other services provided by custodians through certain soft dollar arrangements, such as research, continuing education, client appreciation and educational events, conferences on practice management, regulatory compliance, information technology, and business success. They 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 SWM. These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions. Our custodians may also provide other benefits such as promotional items and meals.

SWM reviews the execution of trades at each custodian annually. Trading fees charged by the custodians are also reviewed on an annual basis. SWM does not receive any portion of the trading fees.

### **Aggregation and Allocation of Transactions**

In some cases, SWM will recommend the purchase or sale of the same security for multiple clients at the same time. In those cases, SWM may combine purchase and sale orders for all clients with the same order. SWM will generally allocate the proceeds arising out of those transactions (and the related transactions expenses) on an average price basis among the various participants in the transactions. SWM believes that by combining orders in this way it will be advantageous to all participants. However, the average price could be less advantageous to a particular client than if that client had been the only account effecting the transaction or had completed its transaction before the other participants.

SWM may also place orders for the same security for different clients at different times and in different relative amounts due to, among other things, differences in investment objectives, cash availability, size of order, and practicability of participating in "block" transactions. The level of participation by different clients in the same security may also be dependent upon other factors relating to the suitability of the security for the particular client. There are circumstances when some of a client's transactions in the security may not be aggregated with other clients. SWM has adopted policies and procedures intended to ensure that our trading allocations are fair to all of our clients.



## REVIEW OF ACCOUNTS

### Managed Account Reviews

We manage portfolios on a continuous basis and generally review all positions in client accounts at least monthly. We offer account reviews to clients no less than annually. Clients may choose to receive reviews in person, by telephone, or in writing. Reviews are conducted individually based on each client's relationship with SWM and its IARs.

In addition, we may conduct a special review of an account based one or more of the following:

1. A change in the client's investment objectives, guidelines and/or financial situation (such as retirement, termination of employment, physical move, or inheritance);
2. Changes in diversification;
3. Tax considerations;
4. Material market, economic, or political events;
5. Material cash deposits or withdrawals; and
6. Purchase or sale of a security in the account.
- 7.

All financial planning accounts are reviewed upon financial plan creation and plan delivery. There is only one level of review and that is the total review conducted to create the financial plan.

### Account Reporting

Each client receives a written statement from the independent custodian that includes an accounting of all holdings and transactions in the account for the reporting period. SWM may also provide additional reporting as agreed upon by SWM and the client on a case-by-case basis.

Financial Planning Clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

## CLIENT REFERRALS AND OTHER COMPENSATION

### Client Referrals to Other Professionals

SWM only refers clients to professionals we believe are competent and qualified in their field. However, it is ultimately the client's responsibility to review the provider. We will generally provide the client with the professional's contact information, and it is solely the client's decision whether to engage a recommended firm. Clients are under no obligation to purchase any products or services through these professionals, and we have no control over the services they provide.

Clients that chose to engage these professionals will sign a separate agreement with the other firm. Fees charged by the other firm are separate from and in addition to fees charged by SWM. If the client desires, SWM will work with these professionals or the client's other advisers (such as an accountant or attorney) to help ensure that the provider understands the client's portfolio and to coordinate services for the client. SWM will never share information with an unaffiliated professional unless first authorized by the client.

If the client desires, SWM will work with these professionals or the client's other advisers (such as an accountant or attorney) to help ensure that the provider understands the client's portfolio and



to coordinate services for the client. SWM will never share information with an unaffiliated professional unless first authorized by the client.

### **Incoming Referrals - Solicitors**

SWM has agreements in place with various solicitors. If a solicitor introduces clients that may be candidates for investment advisory services to SWM, we pay that solicitor a referral fee in accordance with the requirements of Rule 206(4) -3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Compensation to the Solicitor will be an agreed upon percentage of SWM's investment advisory fee or a flat fee depending on the type of advisory services SWM provides to clients. The fee paid to these solicitors is deducted from the advisory fee received by SWM from the client, and therefore, is part of and not addition to the advisory fee paid by the client. The client will not pay additional fees because of this referral arrangement. Any affiliated solicitor of SWM will disclose the nature of the relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of this brochure. Solicitors are not permitted to offer clients any investment advice on behalf of SWM.

### **Other Compensation**

SWM may be compensated via a fee share from third party money managers. The fees shared will not exceed any limit imposed by any regulatory agency.

### **Conflict of Interest**

Referral fees are contingent upon the client entering into an advisory agreement with SWM. Therefore, a solicitor has a financial incentive to recommend SWM to clients for advisory services. This creates a conflict of interest; however, the client is not obligated to retain SWM for advisory services.

## **CUSTODY**

Custody, as it pertains to an investment adviser, has been defined by the SEC as having access or control over client funds and/or securities, but does **not** include the ability to execute transactions in client accounts. Custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody for purposes of the Investment Advisers Act of 1940 and must ensure proper procedures are implemented.

Based on the SEC's definition, SWM is deemed to NOT have custody of SMS's advisory accounts.

### **Fee Debiting**

SWM has limited custody of some of our clients' funds or securities when the clients authorize us to deduct our management fees directly from the client's account. A qualified custodian (i.e. TD Ameritrade or Fidelity) holds clients' accounts.

### **Account Statements**

Clients will receive statements directly from the qualified custodian at least quarterly. The statements will reflect the client's funds and securities held with the qualified custodian as well as any transactions that occurred in the account, including the deduction of our fee.

Clients should carefully review the account statements received from the qualified custodian. When clients receive statements from SWM as well as from the qualified custodian, clients should compare these two reports carefully. Clients with any questions about their statements should contact us at the address or phone number on the cover of this brochure. Clients who do not receive statements from the qualified custodian at least quarterly should also notify us.

## INVESTMENT DISCRETION

### **Discretionary Authority for Trading**

SWM accepts discretionary authority to manage securities accounts on behalf of clients. SWM has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, if discretionary authority or a limited power of attorney has not been given, SWM consults with the client prior to each trade to obtain concurrence. Discretionary trading authority facilitates placing trades in clients' accounts on their behalf so that we may promptly implement the investment policy that they have approved. In most cases, clients are provided with an opportunity for review and discussion prior to implementation of recommendations.

Third party investment managers have full discretion over trades and do not consult with SWM or with clients before placing trades.

## VOTING CLIENT SECURITIES

### **Proxy Voting**

SWM does not accept or have the authority to vote client securities. SWM will not be deemed to have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent. It is the Clients' responsibility to vote all proxies for securities held in accounts being managed by SWM.

Although we do not vote proxies, we permit our IARs to answer questions you may have regarding proxy voting materials in an effort to assist you in determining how to vote the proxy. However, the final decision of how to vote the proxy rests solely with you, the client. It is the decision of each SWM IAR to consult with his/her clients regarding proxy decisions; therefore not all SWM IARs will consult with their clients on proxy matters.

### ERISA

Because we do not vote proxies, clients must ensure the applicable ERISA-plan documents reserve to the plan trustees the right to vote proxies and that the client shall maintain exclusive responsibility for determining all proxy voting decisions.

### Class Actions

SWM does not instruct or give advice to clients on whether or not to participate as a member of class action lawsuits and will not automatically file claims on the client's behalf. However, if a client notifies us that they wish to participate in a class action, we will provide the client with any

transaction information pertaining to the client's account needed for the client to file a proof of claim in a class action.

## FINANCIAL INFORMATION

This item is not applicable to our Disclosure Brochure. SWM does not allow, require or solicit the prepayment of more than \$1,200 in fees per client, six months or more in advance, and does not foresee any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Neither SWM nor our affiliated companies are subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, we have not been the subject of a bankruptcy petition at any time

## PRIVACY POLICY

### How We Use and Protect Personal Information

To Securus Wealth Management, LLC, ("SWM") protecting your privacy is very important. We value your trust and we want you to understand what information we collect, how we protect it, and how we use it. We treat personal information - nonpublic information that identifies you - with respect and in accordance with this privacy policy.

### Information We May Collect

We may obtain information, much of which comes directly from you, to provide you with products and services you have requested and as we deem appropriate, to determine your eligibility for products or services. We may collect identification and contact information, as well as transaction and investment experience information from applications, transactions with others and us, and from outside companies.

### Examples of the Sources and Types of Information We May Collect Include:

- Information about the products and services you purchase through us, including copies or applications, registration forms, or other forms, containing your name, address, telephone number, Social Security number, email address, investment objectives, income, assets, employment information, and accounts with others;
- Information regarding your brokerage and/or investment advisory transaction history with us, our service providers, such as clearing firms, or other companies; and information that other companies who assist us in marketing our own products and services or products we offer jointly with other financial institutions may have, such as your name, address, and telephone number.
- Information under the USA Patriot Act enacted by the United States Treasury Department and Congress to combat terrorism.

(Investor notification is available upon request.)

### Information We May Disclose and to Whom We May Disclose Information

SWM does not disclose your personal information to companies or organizations not affiliated with us that would use the information we have provided them to contact you about their own products and services. We may disclose all the personal information we collect, as described above, to companies, such as insurance companies and brokers, banks, broker/dealers and investment advisers that provides services to you on our behalf, in the following types of situations:

- Providing administrative, customer assistance, clearing, operational, or other services;
- Preparing, printing and delivering investment advisory performance reports, confirmation statements, and other documents;
- Executing securities transactions;

- Maintaining or developing software for us; and a financial institution (such as banks, investment advisers, or securities firms) with which we have joint marketing arrangements to jointly endorse or offer financial products or services. SWM will not sell your personal and confidential information to unaffiliated third parties.

**Disclosures Permitted by Law**

We may also disclose all the information we collect as permitted or required by law. For example, we may disclose information to law enforcement agencies or insurance and securities regulatory agencies.

**Instructions on How to Notify Us**

For any questions regarding this policy, please contact your Registered Representative directly or call the SWM Compliance Department at 763-231-7886.