

# Strategic Wealth Management, LLC

## Disclosure Brochure

March 13, 2015

*Item 1 – Cover Page*

*CRD # 140745*

This brochure provides information about the qualifications and business practices of Strategic Wealth Management, LLC (“SWM” or “Advisor”) and its owners, Anthony D’Aria and Alex Socolof, and support staff.

If you have any questions about the contents of this brochure, please contact us at (646) 220-3327 or [anthony.daria@myswm.com](mailto:anthony.daria@myswm.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.

Strategic Wealth Management, LLC is a Registered Investment Advisor. Registration as an Investment Advisor does not imply any level of skill or training. This disclosure document is designed to grant current clients as well as potential clients the opportunity to carefully read and establish an understanding of the various investment advisory services that are offered and the respective fees and expenses of those services. The information contained in this document is important to the conduct of both parties entering an advisory contract. While investment advisors have a fiduciary duty to put the needs of clients before their own, clients likewise have a duty to investigate and maintain a basic understanding of the services offered by the Advisor. We hope this document serves as a leading educational tool to aid clients and prospective clients in understanding how Strategic Wealth Management, LLC conducts investment advisory services.

Strategic Wealth Management, LLC  
555 Pleasantville Road, N106  
Briarcliff Manor, NY 10510  
(646) 220-3327

## *Item 2- Material Changes*

We recently updated the outside business activity disclosure for Alex Socolof. The update included disclosure of his ownership interest in a company named GSENSE. More information is available about the owner ship of that company under Part 2B of the supplemental brochure.

There have been no material changes in the services offered by Strategic Wealth Management, LLC in the past year. In the future, this portion of the brochure will discuss specific material changes that are made to the brochure and provide clients with a summary of such changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

Additional information about Strategic Wealth Management, LLC is also available via the SEC web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC web site also provides information about any persons affiliated with Strategic Wealth Management, LLC who are registered as investment adviser representatives of SWM.

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#### *Item 4 – Advisory Business*

Strategic Wealth Management, LLC was formed in April of 2006 and is a Limited Liability Company organized in the State of New York. Anthony D’Aria and Alex Socolof are the owners/operator. Strategic Wealth Management, LLC was registered with the SEC on January 16, 2006.

Strategic Wealth Management, LLC provides “fee for service” financial planning and investment advice. Areas of advice include asset allocation, investment selection, retirement planning, college funding and employee benefits and qualified plan subaccount analysis. Engagements are limited in scope based on the client’s unique circumstances. As of December 31<sup>st</sup>, 2014, Strategic Wealth Management, LLC managed \$ 18 million on a non-discretionary basis.

The Advisor gathers financial data including the client’s goals, circumstances, financial condition and risk tolerance. The adviser then prepares and delivers analysis and recommendations to the client. Recommendations may be in a written/electronic format, or in the form of verbal (in-person or phone) discussion, or both.

Clients engage Strategic Wealth Management, LLC on a “pay as you go” basis. The services a client receives are dependent upon the individual needs and requests by the client, but often times the services rendered are continuous and on-going. The investment management services provided by Strategic Wealth Management, LLC often involves performing asset allocation adjustments where trades are conducted with the use of Advisor discretion. The Advisor will perform investment management to a client’s account in accord with defined goals and risk tolerances provided by the client. When discretionary authority has been given to Strategic Wealth Management, LLC or one of the IARs of SWM and company, this allows SWM to “take action” without first receiving approval from the client. The “action” is limited to purchases and/or sales of securities (Stocks/Bonds/Mutual Funds/ETFs...), but does not allow the Advisor to move funds between accounts or transfer assets from the account. All transactions occur at a qualified custodian that produces statements. These statements may be produced monthly, but must be produced at least quarterly and contain the basic account value and holdings of the managed accounts along with listing the activity that occurs within the account(s) being managed by SWM. The statement provided by the custodian will also contain the advisory fee charged by SWM. Fees charged by SWM are separate from the fees charged by Mutual Funds and other investment companies. Therefore, SWM recommends consulting the Mutual Fund prospectus for more information about their fees.

SWM also provides long term buy and hold services that do not involve active management of client accounts. Clients may choose a service that offers asset allocation services that are managed by SWM that make less active transactions and is designed to keep expenses low, while offering market related rates of return. If services are selected that do not entail discretionary authority, then clients are free to implement all, some, or none of the Advisor’s recommendations and the full responsibility of implementation rests with the client.

### *Item 5 – Fees and Compensation*

Fees are charged on a “pay as you go” basis. Fees are negotiable and may vary from client to client. Fees are quoted in advance and must be accepted by client prior to project commencement or investment management. Executing a signature on the client agreement or paying a partial/full payment of fee acknowledges acceptance by client.

Strategic Wealth Management, LLC negotiation of investment management fees are based on one or more of the following factors:

- The number of accounts, positions, account objectives, risk tolerances and restrictions requested by the client
- The estimated amount of time expended in researching, analyzing and documenting the specific recommendation(s) and course(s) of action.
- The requests of each client regarding follow up and forms of communication requested
- The familiarity (or lack thereof) between SWM and the client based on experience and client interaction
- A competitive analysis of other advisory firm’s fees
- The total amount of assets requested to be managed

Client agrees to supply Strategic Wealth Management, LLC with the ability to deduct fees from the account(s) on a quarterly basis. This fee deduction process will occur in arrears of service provided and will be accompanied by a quarterly fee notification that will be supplied to the client and evidenced on the account statement produced by the qualified custodian. Quarterly fees are based on the ending value of securities on the last day of the quarter.

The following is an example of how a quarterly fee is calculated:

\$800,000.00 value of assets under management on the last day of the quarter at an annual fee of 1.5% would render the following quarterly bill.

1.5% annual fee divided by 4 individual quarterly periods = 0.00375

$\$800,000.00 \times 0.00375 = \$3000.00$  Fee for the quarter

Advisory fees are calculated, and billed quarterly, in arrears. Annual percentages applied currently range from 0.375% to a maximum fee of 2.00%, but are subject to change, and are subject to negotiation and individual determination based upon particular facts and circumstances of a client and the extent of advisory services anticipated. Clients may choose to pay fees by check or opt to have the fees debited directly from client's accounts as stated in the Client Services Agreement. These fees may

be considered higher than average as related to other investment advisory firms, as such, clients may be able to attain similar services at a lesser cost elsewhere.

Discretionary Transactions are directed by SWM for accounts that have a limited discretionary authority agreement. Clients who choose to provide SWM with discretion have empowered SWM to buy and sell securities without the client's prior knowledge or consent. Clients may, by contract, place restrictions on SWM's discretionary authority.

Strategic Wealth Management, LLC has no direct relationship with any specific custodian or brokerage firm and receives no commission compensation from Fidelity Institutional Wealth Services with regard to client transactions. The platform at Fidelity Institutional Wealth Services is a quality, low fee, low ticket charge, brokerage option that has been a good fit for investment management services.

Strategic Wealth Management, LLC management programs are not considered "wrap fee program" in that clients are responsible for paying any and all transaction costs, including, but not limited to customary ticket charges, postage and service fees and annual maintenance fees that may be issued by the custodians.

#### *Hourly Charges and Fixed Fees Charged by Advisor*

Advisor provides investment planning services consistent with individual client's financial and tax statues, risk tolerance and investment objectives. Fees are billed at a negotiated rate between the parties. Hourly fees usually range from \$200 to a maximum rate of \$400 per hour. The client may make structured payments with a portion of the fees paid up-front and the remainder of payments made upon completion of the service(s). These options are available in the client agreement. Planning fees are often paid by check, but if the client chooses, they may have the fees debited directly from accounts managed by Advisor. These services may also be negotiated as a fixed fee. Unless otherwise stated, client agreements are for a period of one year and are automatically renewed each year. The Client or Advisor may terminate the advisory agreement at any time upon thirty (30) days written notice. There is no provision for refunds when services have been rendered.

In certain instances, depending upon the client's needs and the services to be performed by the Advisor, the advisory fee may be based upon individual negotiations with the client. In such instances, the fee is stipulated and agreed upon in the advisory contract.

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

Strategic Wealth Management, LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

### *Item 7 – Types of Client*

Strategic Wealth Management, LLC takes an active approach to managing the types of clients that are accepted by the firm. The clients that Strategic Wealth Management, LLC currently choose to work with are often “main street” every day people. There are some clients that have high net worth and would be considered “accredited” investors (individual net worth of any natural person, or joint net worth with the spouse of that person, at the time of purchase, is more than \$1,000,000 [as such amount is adjusted periodically by rule of the Commission], excluding the value of the primary residence of such natural person.) However, Strategic Wealth Management, LLC does not impose any account limits or restrictions for maintaining or managing an account. The firm requires clients to disclose current financial status and investment objectives to the Advisor at the time of opening an investment account. These documents are updated as needed. Clients are requested to inform the Advisor whenever the client has experienced a significant change in financial status or condition or wish to change the investment objectives on the account. (Example: Client wishes to change investment objective from Aggressive Growth to Moderate. The client would need to complete a new account form that evidences this request.) In general, most clients are residents of the State of New York, while a few live in multiple locations largely dependent on the different seasons of the year.

SWM’s clientele could be categorized as individuals, businesses and trusts. The services offered to each may vary and is largely dependent upon the client’s unique circumstances. Strategic Wealth Management, LLC has each client execute an independent agreement and each agreement offers services separately to each individual client.

### *Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss*

If an Advisor is engaged to provide Investment advice, the client’s current financial situation, needs, goals, objectives and risk tolerance are first evaluated. Asset allocation and security selection decisions are then made with the aid of computer models that are labeled with investment objectives: Growth, Moderate, Conservative or Bond focused. The portfolio of models may already exist or if the Advisor deems necessary, a new model portfolio may be constructed for the client individually. The portfolios are often comprised of multiple asset categories and sectors and have the ability to perform multiple styles of asset allocation including ranges from 100% equity exposure to 100% cash exposure. Investment overlap and diversification are key components to the investment portfolio design.

While the typical asset allocation elected by a large majority of the investment advisory community would include Large Cap, Mid Cap, Small Cap, Bonds and International segments. Our growth portfolio processes often evaluate all of those, but also may include special sectors like: financials, global/foreign, gold, silver, commodities, natural resources, technology, health care, real estate, region specific/country specific, utilities, world bonds and more... thus allowing the models to select risk appropriate positions from a large population of investment opportunities.

There are substantial risks involved by investing in securities. It is the client's responsibility to read and review the monthly/quarterly statements and provide feedback as to their comfort or lack thereof with the then current asset allocation of their individual portfolio(s). Our method of investing may rotate from one category/sector to another from time to time. The allocation that exists one day or one week may not be representative of the allocation the following day, week, month or quarter. Therefore, we recommend establishing an electronic access to the custodian who holds or custodies your securities and provides monthly or quarterly statements. The electronic access will allow clients to view the account as frequently as they like and will offer a more recurrent analysis of the portfolio's progress.

Additionally, there are complexities and risks associated with trading securities including, but not limited to: execution or trading errors, price volatility, bid/ask spreads, order types (such as "market" and "limit" orders), deviation from net asset value and "execution price slippage" caused by lack of order or book depth. This is commonly seen in some of the more thinly traded stocks or ETFs that don't usually experience a lot of daily trading volume. An example of such a dilemma was the "flash crash" that the market experienced on May 6, 2010. On that day the Dow Jones Industrial Average plunged about 900 points only to recover those losses later in the trade day. It was the second largest point swing, 1010.14 points, and the biggest one-day decline, 998.50 points, on an intraday basis in Dow Jones Industrial Average History.<sup>1</sup>

The products used to allocate client assets may range from Money Market/Cash instruments to Mutual Funds, Individual Issue Stocks and Bonds as well as gold, silver and other hard assets. Exchange-traded funds (ETFs) are another tool that can be used by SWM to manage client accounts, the price execution risk is much higher with ETFs than mutual funds, because their price fluctuates like a stock and can be traded multiple times per day.

Use of leverage funds in a client's portfolio often adds risk to the portfolio. Leveraged funds, which use futures and options to amplify returns, try to return two to three times the daily returns of a particular index. Strategic Wealth Management, LLC does not usually recommend leveraged funds to the general public as they are volatile positions that can move quickly and materially affect a client's account value causing extensive damage to a portfolio. However, due to the liquidity that is often found as a characteristic of leveraged funds, SWM may from time to time purchase leveraged bond funds that contain 1.2 times or more the movement of the respective bond index. The use of such leverage is often conducted to accommodate specific liquidity needs of the client or to activate new investment assets that have been transferred into the client's portfolio. Other leveraged sector funds could be used to accommodate liquidity issues as well, but the time frame for holding those volatile positions would likely be short.

Clients have the right to place a restriction on their account that would not allow the use of leveraged investments in their portfolio. That restriction request must be performed in writing. However, this

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<sup>1</sup> [http://en.wikipedia.org/wiki/2010\\_Flash\\_Crash](http://en.wikipedia.org/wiki/2010_Flash_Crash)



restriction would not require the Advisor to know how the individual fund invests internally. Many mutual funds use options, futures and derivative instruments to invest public clients' assets. This restriction would merely cause the Advisor to stay away from funds that market an investment strategy that is designed to amplify the returns of an index in a leveraged fashion.

In addition to the leverage, SWM will occasionally use "Short" positions. These kinds of funds offer the potential of profiting from falling stock prices. When a short position is taken it can offer defensive qualities against a "falling" or "Bear Market". Short positions appreciate in price moving inverse to the price movement of an index. There are substantial risks associated with "short" market positions especially when leverage is used. If a client is invested in a short position and the index that the position is tracking rises, the short position will lose money. Conversely, if the index falls in value the short position would profit from the downward move of the underlying index.

### *Material Risks*

Risk can be best defined as uncertainty or not knowing what is going to happen to your investment. Clients considering investments should consider various risks including the following:

- **Interest Rate Risk** – This is the variability in a security's return resulting from changes in the level of interest rates. Such changes affect all securities inversely. Interest rate risk affects bonds more directly than common stocks, and is a major risk faced by all bondholders. As interest rates change, bond prices change in an inverse direction.
- **Market Risk** – Market risk is the variability in returns due to fluctuations in the overall market – that is, the aggregate stock market. All securities are exposed to market risk, although it affects primarily common stocks. Market risk includes a wide range of factors outside of securities themselves, including recessions, wars, structural changes in the economy, and changes in consumer preferences.
- **Inflation Risk** – A factor affecting all securities is the chance that the purchasing power of invested dollars will decline. With uncertain inflation, the real (inflation-adjusted) return involves risk even if the nominal return is historically safe, as in – for example – a US Treasury bond.
- **Business Risk** – The risk of doing business in a particular industry or environment is called business risk.
- **Financial Risk** – Financial risk is associated with debt financing by companies. The larger proportion of assets financed by debt (as opposed to equity), the larger the variability in the returns. Financial risk involves the concept of financial leverage.
- **Liquidity Risk** – This is the risk associated with the particular secondary market in which a security trades. An investment that can be bought or sold quickly and without significant price concession is considered liquid. The more uncertainty about the time element and the price concessions, the greater the liquidity risk. A Treasury bill has little or no liquidity risk whereas a very small stock may have substantial liquidity risk.

### *Item 9 – Disciplinary Information*

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to one's evaluation of Strategic Wealth Management, LLC or the integrity of SWM's management (and each supervised person providing investment advice). Strategic Wealth Management, LLC has no information applicable to this item regarding the firm or its principal owners and advisors, Anthony D'Aria and Alex Socolof, or the rest of the Investment Advisory Representative (IAR) staff. Any legal items that are not securities related will be further disclosed on ADV Part 2B of each IAR.

### *Item 10 – Other Financial Industry Activities and Affiliations*

Strategic Wealth Management, LLC does not have other industry activities or affiliations.

### *Item 11 – Code of Ethics*

Strategic Wealth Management, LLC has created a code of ethics that is designed to help educate and monitor the business conduct of our office staff. The code emphasizes the firm's fiduciary duty to clients and produces a heavy burden on the staff to maintain client confidentiality. A copy of the code of ethics is available to clients or prospective clients upon request.

Anthony D'Aria and/or other employees of Strategic Wealth Management, LLC may occasionally buy or sell securities for their own accounts. The firm may or may not recommend these securities to clients since recommendations vary according to an individual client's specific needs and circumstances. Additionally, staff members may use asset management practices that will actively allocate and may buy or sell securities without consideration of client holdings. These securities are publicly traded and it is highly unlikely that transactions in the personal accounts of the firm's employees could adversely affect the price or performance of the securities.

Should an employee become aware of any non-public information regarding a security, it is the firm's policy that the employee not act on such information for his/her own benefit or for the benefit of clients and report the information to Strategic Wealth Management, LLC management (and the proper regulatory authorities, if warranted).

### *Item 12 – Brokerage Practices*

Strategic Wealth Management, LLC may recommend brokerage platforms based on trading and technology, the depth and breadth of services, the customer service responsiveness and brokerage transaction costs and best execution records. Currently, Strategic Wealth Management, LLC often recommends the Fidelity Institutional Wealth Services platform as its main brokerage/custodian. Such recommendation is based on the history and experience that Strategic Wealth Management, LLC has

established with Fidelity Institutional Wealth Services, but also due to the continued industry leadership and best execution practices they display in ongoing performance. When SWM performs trades for clients, those orders are placed individually and may therefore have different execution prices that are received by each client for the same security.

### *Item 13 – Review of Accounts*

The reviews of client accounts in the Strategic Wealth Management, LLC program are performed periodically and/or at least quarterly. These reviews will encompass performance evaluation, asset allocation analysis and customer suitability review. The triggering factors for evaluation may include, but are not limited to: change in product composition, change in market condition, change in management philosophy, change in client's financial condition, and any other change of which client appraises the Advisor. Levels of review include: summary review of account statements; in-depth review of statements, objectives and current performance. The client may be invited to attend a detailed review involving a meeting to discuss any and all related investment strategy and/or future planning. Anthony D'Aria conducts the review process.

### *Item 14 – Client Referrals and Other Compensation*

Strategic Wealth Management, LLC does not often enter into referral/solicitor agreements. At current, there are no relationships where SWM compensates another individual for client referrals.

### *Item 15 – Custody*

In 2010, the Securities Exchange Commission (SEC) adopted amendments to Rule 206(4)-2 (the "Custody Rule") under the Investment Advisers Act of 1940 (the "Advisers Act") which governs custody arrangements for registered investment advisers. Prior to that amendment SWM, due to various "No Action" letters and safe harbor provisions issued by the SEC, was deemed to not have custody of client funds. However, after the amendment in 2010, the billing practices of Strategic Wealth Management, LLC are now considered to create a form of custody since advisory fees can be deducted directly from client accounts. This form of custody is very limited. Strategic Wealth Management, LLC is not permitted to take control of any client assets or transfer client assets to or from a client's account unless directed or authorized by the client to do so. SWM does not take possession of client securities or assets. They are held at places like Name of Preferred Custodian that meet the standards and requirements that include providing statements to all clients that reflect their securities activity during a given quarter.

Strategic Wealth Management, LLC is not affiliated with any custodial services and is "operationally independent" from any custodian that generates statements for clients. As such, Strategic Wealth Management, LLC merely performs the calculation of the fees and supplies that information to the custodian, who in-turn debits the fee and reports the activity on the statement. While the act of

debiting the fee directly from the client account meets the new definition of custody as amended by the SEC in their 2010 amendment notice for rule 206(4)-2 under the Investment Advisers Act of 1940; the SEC carved out a provision in the rule change that exempted firms from an annual surprise audit on its books and records, if they merely met the definition of having custody due to the ability to deduct the fee from the client(s) account. The basic provisions for the exemption that Strategic Wealth Management, LLC and its members adhere to are:

- Maintain accounts at a “qualified custodian”, institutions to which clients and advisers customarily turn for custodial services.
- Those custodians are subject to regulations and oversight.
- Strategic Wealth Management, LLC maintains a reasonable belief that the qualified custodians send statements directly to advisory clients.

These requirements are designed so that advisory clients will receive a statement from the qualified custodian and have the opportunity to compare and contrast with any statements or other information they receive from their advisor to determine whether account transactions, including deductions to pay advisory fees, are proper. While Strategic Wealth Management, LLC often provides individual account assessments for clients on a quarterly basis, SWM is operationally independent from Fidelity Institutional Wealth Services and other custodians. As such, we urge clients to compare the documentation provided directly from Strategic Wealth Management, LLC to the statements provided from the independent custodians.

#### *Item 16 – Investment Discretion*

Strategic Wealth Management, LLC develops investment management portfolios. The most efficient way to execute this kind of investment process is through the use of discretionary authority to place trades prior to receiving instruction or confirmation from each client. The discretionary authority granted to Strategic Wealth Management, LLC when a client enters the client agreement is limited. The authority limits the discretion to purchases and sales within the account. Strategic Wealth Management, LLC members have no authority to transfer assets to or from accounts, other than when deducting fees on a quarterly basis. Therefore, the discretion is limited and may be canceled by the client at any time. However, the cancelation of the discretionary authority would likely necessitate the client being removed from the active management program.

#### *Item 17 – Voting Client Securities*

Strategic Wealth Management, LLC does not vote proxies on behalf of clients. The proxies are sent from the custodian or Investment Company directly to the client’s address of record. The client is welcome to vote proxies as they see fit. Strategic Wealth Management, LLC does not make recommendations as to how or for whom to vote.

### *Item 18 – Financial Information*

Registered Investment Advisors are required in this item to provide you with certain financial information or disclosures about SWM's financial condition. Strategic Wealth Management, LLC has no financial commitment that impairs its ability to meet its financial obligations and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

### *Item 19 – Requirements for State-Registered Advisers*

If this disclosure brochure was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory agreement with this investment advisor, then the client has the right to terminate the agreement without penalty within five business days after entering into the agreement. For the purposes of this provision, an agreement is considered entered into when all parties to the agreement have signed the agreement, or in the case of an oral agreement otherwise signified their acceptance.

### *Educational Background and Business Experience*

Anthony D'Aria----DOB 05/15/1967

#### Formal Education After High School:

Manhattanville College, Purchase, NY 1989  
Bachelor of Arts in Economics/Political Science  
Manhattanville College, Purchase, NY 1992  
MAH Economics/Political Science

#### Business Background for the Preceding Five Years:

Strategic Wealth Management, LLC and Registered Representative of New Bridge Securities, Ft. Lauderdale, FL from 2006 to 2010; Newbridge Securities is a registered broker/dealer member FINRA. UBS Investment Broker 2000 to 2006.

Alex Socolof----DOB 09/10/1957

#### Formal Education After High School:

American University, Washington D.C. 1978  
Bachelor of Science in Political Science

#### Business Background for the Preceding Five Years:

Strategic Wealth Management, LLC and Registered Representative of New Bridge Securities, Ft. Lauderdale, FL from 2006 to 2010; Newbridge Securities is a registered broker/dealer member FINRA. UBS Investment Broker 2000 to 2006

### *Other Business Activities*

Strategic Wealth Management, LLC is a registered investment advisor and its sole responsibility is offering fee based investment advice. Alex Socolof is the 60% owner of a company named GSENSE. The company has a patent for Solar Wind Turbine Communication Server Network Apparatus Method and Mechanism. There has not yet been any commercial implementation of this product, nor have there been any sales. The amount of time spent on this product is essentially zero, but the potential for future activity is possible.

### *Additional Compensation*

Members of Strategic Wealth Management, LLC could be invited to due diligence meetings at the request of investment companies or other industry organizations. On occasion, travel reimbursements are made by those companies that extended the invitation. While these payments would only reimburse travel expenses, the appearance of “pay for production” may exist and as such the potential conflict of interest has been disclosed.

In order to be clear, accounts that are held at Fidelity Institutional Wealth Services do not allow for any commission payments of any kind to be paid to Strategic Wealth Management, LLC or any of its direct members. These accounts are fee based advisory accounts. The only compensation derived from Fidelity Institutional Wealth Services accounts are the quarterly fees that are evidenced on each quarterly statement provided to the client directly from Fidelity Institutional Wealth Services.

### *Privacy Policy*

In order to facilitate the servicing of your account, the Advisor may receive nonpublic personal information about you from the following sources:

- Information we receive from you on questionnaires, applications, account opening documents or other forms;
- Information about your transactions with us or others;
- Information we receive from a consumer reporting agency; and
- Information we received from other sources with your consent.

We do not disclose any nonpublic personal information about you to anyone, except as permitted by law. Such disclosure may include the following:

- Disclosures to affiliates, including affiliated service providers (for example, insurance agencies for processing of variable insurance applications on your behalf);
- Disclosures to your chosen broker-dealer firm (for example, to establish a brokerage account on your behalf);

- Disclosures to government agencies, securities regulators and law enforcement officials (for example, for tax reporting, under a court order or to protect our legal rights);
- Disclosures to other organizations, with your consent (for example, other investment advisor firms in order to open a managed account with their firm or the brokerage firm they utilize); and
- Disclosures to other persons you authorize to obtain such information (for example, a CPA who will be preparing your tax return).

The Advisor restricts access to your personal and account information to those of its employees who need to know that information to provide products or services to you. The Advisor maintains physical, electronic, and procedural safeguards to guard your nonpublic personal information.

We will continue to adhere to the privacy policies and practices as described in this notice if you decide to close your account(s) or become an inactive customer.

If you have any questions concerning the Advisor's privacy policies and procedures, please feel free to contact us. Thank you.