

The Second Half Team Wrap Program

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This wrap account program brochure provides information about the qualifications and business practices of Swaine & Leidel Wealth Services, LLC (the “Adviser”). If you have any questions about the contents of this brochure, please contact the Adviser at (863) 385-1101. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority.

Swaine & Leidel Wealth Services, LLC is a registered investment advisor. Registration of an investment advisor does not imply any level of skill or training. The verbal and written communications of an investment advisor provide you with information you need to determine whether to hire or retain the advisor.

Additional information about the Adviser also is available on the SEC’s website at www.adviserinfo.sec.gov.

Swaine & Leidel Wealth Services, LLC

Our last amendment to our Wrap Program Brochure was filed July 5, 2018. Since then, we have updated Item 4 to provide more information about our fees.

This item will be updated with the next annual updating amendment to reflect material changes to the Wrap Brochure.

ITEM 3

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ITEM 4: SERVICES, FEES AND COMPENSATION

Advisory Services

Swaine & Leidel Wealth Services, LLC

Swaine & Leidel Wealth Services, LLC (referred to as “we,” “our,” “us,” or “Swaine & Leidel”), became registered as an investment advisor in October, 2012. Our principals are J. William Swaine and G. David Leidel, Managing Members. Swaine & Leidel acts as the portfolio manager and sponsor of The Second Half Team Wrap Program.

Investment Management

We provide investment management services that include the development, presentation and implementation of investment recommendations, and ongoing supervision and management of client investment assets. Other services include tax-related management and reporting, periodic rebalancing, semi-annual and annual reviews with clients.

In addition, we offer investment consulting, estate planning consulting, and retirement income consulting services.

We tailor our services to the individual needs of the client through the use of a risk analysis questionnaire and the development of a personal profile. Clients may not impose restrictions on the types of investments made, as long as those investments fall within the investment guidelines agreed to with the client.

How Investments are Selected

We follow the principles of asset and tactical allocation to construct diversified investment portfolios that are designed for the long-term and are based on each client’s personal circumstances (goals, time horizon, risk tolerance, tax considerations). We implement these portfolios using a combination of exchange traded funds, individual stocks and mutual funds.

Exchange Traded Funds (ETFs) are subject to market risk, including the possible loss of principal. The value of the portfolio will fluctuate with the value of the underlying securities. ETFs trade like a stock, and ETFs may trade for less than their net asset value. Diversification does not ensure a profit and may not protect against loss in declining markets. ETFs may have underlying investment strategy risks similar to investing in commodities, bonds, real estate, international markets or currencies, emerging growth companies, or specific sectors. When investing in bonds, it is important to note that as interest rates rise, bond prices will fall. Due to their narrow focus, sector-based investments typically exhibit greater volatility. There are special considerations associated with international investing, including the risk of currency fluctuations and political and economic events. Investing in emerging markets may involve greater risk and volatility than investing in more developed countries.

Mutual Funds are subject to market risk, including the possible loss of principal. The value of the portfolio will fluctuate with the value of the underlying securities. Diversification does not ensure a profit and may not protect against loss in declining markets. Mutual Funds may have underlying investment strategy risks similar to investing in commodities, bonds, real estate, international markets or currencies,

emerging growth companies, or specific sectors. When investing in bonds funds, it is important to note that as interest rates rise, bond prices will fall. Due to their narrow focus, sector-based investments typically exhibit greater volatility. There are special considerations associated with international investing, including the risk of currency fluctuations and political and economic events. Investing in emerging markets may involve greater risk and volatility than investing in more developed countries.

Individual securities are subject to market risk. The value may go up or down, sometimes rapidly due to factors affecting securities markets generally or in particular industries, resulting in the possible loss of principal. Individual securities are also subject to risks related to the companies themselves, the sectors that they are in, and the economy as a whole. Diversification does not ensure a profit and may not protect against loss in declining markets.

There are special considerations associated with international investing, including the risk of currency fluctuations and political and economic events.

All investments involve different degrees of risk.

Although we do a great amount of work to determine in advance a client's risk tolerance, it is important to understand that investing money involves many risks, including the risk of loss of principal, and clients should be prepared to bear this risk. We cannot guarantee any particular investment outcome.

Proxy Voting

We do not accept the authority to vote proxies on your behalf, but will provide guidance about how to specific vote proxies upon request. You will receive proxies and other related paperwork directly from your custodian.

Advisory Fees

Fees for investment management services are calculated as a percentage of assets under management. These fees are billed monthly in arrears, based on the assets under management as of the last day of the month. Our standard fee schedule is:

<u>Assets under Management</u>	<u>Annual Fee</u>
Up to \$500,000	1.25%
\$500,001 - \$1,000,000	1.15%
\$1,000,001 - \$1,500,000	1.00%
\$1,500,001 - \$2,000,000	0.90%
2,000,001 - \$3,000,000	0.75%
Over \$3,000,000	0.65%

Fees may be negotiated in limited circumstances based on account size and competitive situation. Any negotiation is solely at the discretion of Swaine & Leidel.

You may provide authorization for us to deduct our fees directly from your investment account.

- You must provide authorization in our contract with you for us to deduct fees.

- You will receive a detailed invoice each month which outlines our fees and how they are calculated at the same time we request payment from the custodian.
- You will receive a statement, at least quarterly, from your custodian which shows all transactions in your account, including the deduction of our fee.

You may elect to pay by check rather than having payment deducted directly from your account.

Our fees may be reduced or waived at the sole discretion of Swaine & Leidel. For any calendar quarter in which Swaine & Leidel manages a client's account for less than a full calendar quarter, fees will be prorated for the percentage of the calendar quarter for which the client's account is under management. You may end our advisory relationship by providing written notice. We will prorate the advisory fees earned through the termination date and send you an invoice for the advisory fees due.

We do not receive performance-based fees.

New clients with assets of less than \$100,000 under management with Swaine & Leidel are responsible for the costs associated with selling existing holdings that do not meet our investment holding guidelines. In either case, Swaine & Leidel will be responsible for the expense of purchasing holdings. If a client withdraws funds in excess of 15% of the account value, or terminates an account, any fees or other expenses associated with liquidating the account's holdings will be assessed to the account.

As a wrap account program participant you will not incur transaction charges (except for brokerage charges to the extent that trades are conducted through brokers or dealers other than who we choose), other than in special circumstances and described above. However, you may pay custodial fees, charges imposed directly by mutual funds and exchange traded funds or index funds. These charges are disclosed in each fund's prospectus.

Other Compensation

The advice we offer you may involve investment in mutual funds and/or exchange traded funds ("ETFs"). All fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders (described in each fund's prospectus). Such fees will generally include management fees and other fund expenses.

The fees not included in the advisory fee for our wrap services are charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, fees for trades executed away from custodian, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions.

We advise you to review all fees charged by mutual funds, ETFs, Swaine & Leidel and others to fully understand the total advisory fees you may be paying.

We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. A wrap account program may not be suitable for all your investment needs, and your decision to participate in a wrap fee program should be based on your individual financial circumstances and investment goals.

The benefits under a wrap account program depend, in part, upon the size of your account and the number of transactions likely to be generated in the account. For example, wrap accounts may not be suitable for accounts with little activity or accounts comprised principally of fixed income securities.

Participating in a wrap account program may cost more or less than the cost of purchasing the same services separately from a broker or dealer.

ITEM 5: ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Our clients are typically individuals, trusts and foundations. We do not require that clients have a minimum asset value in order to provide advice.

ITEM 6: PORTFOLIO MANAGER SELECTION AND EVALUATION

Investment advice is provided by Michael D. Fitch, Financial Advisor, J. William Swaine, Managing Member/Financial Advisor and Murrell L. Winter, Financial Advisor. Additional information regarding each of these individuals is provided in the attached Part 2B.

We do not require particular qualifications that our personnel must meet as to education or business experience. Rather, we select personnel involved in giving investment advice based on criteria that takes into account many factors relating to their overall experience, qualifications and integrity. In addition, all personnel involved in giving investment advice must meet the examination or experience requirements of the states in which they provide investment advisory services.

If a client expresses a preference for a portfolio manager we will work to accommodate that request. Portfolio managers may be changed at the client's request or on our initiative either to balance workload or to match a client's particular needs with the portfolio managers' varying areas of expertise and/or experience.

ITEM 7: CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

When you establish an investment advisory account with us, one of our investment personnel will discuss with you your current financial situation, return objectives, risk tolerance, investment restrictions and other relevant information. It is your responsibility to provide accurate and complete information. The failure to do so could affect the services we provide. We enter into an investment management agreement with each client which discloses the investment style we will use to manage your account.

We do not share or disclose client information to nonaffiliated third parties except as permitted or required by law or as necessary to open and service your account. We are committed to safeguarding the confidential information we receive from clients.

ITEM 8: CLIENT CONTACT WITH PORTFOLIO MANAGERS

Clients may contact and consult directly with us during regular business hours, which are Monday through Friday, 8:00 a.m. to 5:00 p.m. There are no restrictions on client access to us—clients may contact us as often as is necessary to discuss their account and other financial needs.

We review the performance of individual portfolios and portfolio managers at least annually. No independent third parties are used to monitor performance. We attempt to measure performance in client accounts on a uniform and consistent basis but may alter our methodology in unusual cases, such as when a client portfolio holds private investments, restricted securities, control securities or other difficult-to-value assets.

ITEM 9: ADDITIONAL INFORMATION

Disciplinary Information

We have no legal or disciplinary events to report involving Swaine & Leidel, or any related individual.

Other Financial Industry Activities and Affiliations

All of our officers and some investment personnel are also insurance agent registered with various insurance agencies, and as such sell insurance products. They may recommend insurance products to clients and may receive commissions for such sales if a client elects to purchase such products through these individuals in their capacity as insurance agent. The insurance products sold are transacted with a variety of insurance companies on a commission basis. Disclosure is provided on Part 2B, Item 4 for each individual who is also licensed to sell insurance.

In these situations, a conflict of interest exists between your interests and those of Swaine & Leidel.

Clients are under no obligation to purchase or apply for any insurance, or to use any investment personnel of Swaine & Leidel as the agent for insurance products purchased.

Commissions are the primary compensation of our officers and employees who are registered insurance agents. We do not reduce our advisory fees to offset any insurance commissions earned.

All of our officers are also managing members of U.S. Tax, LLC a consulting firm that assists its clients with preparing tax returns and representing them before the IRS. Because of the limited amount of time spent on this activity, it does not create a conflict of interest. Clients of Swaine & Leidel are under no obligation to use U.S. Tax, LLC.

Code of Ethics

We have adopted a code of ethics (“Code of Ethics”) for all of our employees describing our high standard of business conduct and fiduciary duties to our clients. The Code of Ethics is to ensure we fulfill our fiduciary duty to clients by always acting in their best interest and maintaining a strong culture of compliance by following all securities laws, rules and regulations.

Our employees and persons associated with us are required to follow the Code of Ethics. Subject to satisfying the Code of Ethics and applicable laws, our officers and employees may trade for their own accounts in securities which are purchased for our clients. Among other things, our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in your best interest and (ii) implementing the decisions while, at the same time, allowing employees to invest for their own accounts. Because the Code of Ethics in some circumstances permits employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee.

You may request a copy of the firm's Code of Ethics by contacting us.

Personal Trading for Associated Persons

We may buy or sell some of the same securities for you that we already hold in our personal account. We may also buy for our personal account some of the same securities that you already hold in your account. It is our policy not to permit our associated persons (or their immediate relatives) to trade in a way that takes advantage of price movements caused by your transactions.

We may restrict trading for a particular security for our accounts or those of our associated person if there is a pending trade in that security in a client account. Trades for our accounts (and those of our associated persons) will be placed after client trades have been completed. Additional information about block trades is provided in the Aggregation of Orders section of “Item 12: Brokerage Practices.” When our trades are placed after our client trades, we may receive a better or worse price than that received by the client.

Swaine & Leidel and its associated persons may purchase or sell specific securities for their own account based on personal investment considerations without regard to whether the purchase or sale of such security is appropriate for clients.

All persons associated with us are required to report all personal securities transactions to us quarterly.

Review of Accounts

All accounts are reviewed quarterly by Michael Fitch, Financial Advisor and J. William Swaine, Principal/Financial Advisor. All accounts are reviewed in relation to their target portfolio weights, market movements, changes in fund recommendations, and shifts in target asset allocations.

Portfolio Reports Provided to Clients.

We do not provide regular reports to investment management clients. These clients will receive statements directly from Schwab which contain information about all transactions made in the account.

Other Compensation

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to its institutional brokerage— trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Here is a more detailed description of Schwab’s support services:

Services That Benefit You.

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You.

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account.

Our receipt of the foregoing economic benefits from Schwab raise potential conflicts of interest. Our receipt of these services does not diminish our duty to act in your best interest.

Use of Solicitors

We do not directly or indirectly compensate anyone for client referrals.

Financial Information

We do not charge or solicit pre-payment of more than \$1,200 in fees per client six months or more in advance. We have never filed for bankruptcy and are not aware of any financial conditions that are reasonably likely to impair our ability to meet our contractual obligations to clients.