



## **Scottsdale Wealth Planning, Inc.**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: May 21, 2018**

This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Scottsdale Wealth Planning, Inc. ("SWP" or the "Advisor"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (480) 550-8555.

SWP is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through SWP to assist you in determining whether to retain the Advisor.

Additional information about SWP and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 169248.

**Scottsdale Wealth Planning, Inc.**  
**7033 E. Main Street, #104, Scottsdale, AZ 85251**  
**Phone: (480) 550-8555 \* Fax: (480) 550-9555**  
<http://scottsdalewealthplanning.com>

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of SWP.

SWP believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. SWP encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

The Advisor has changed their registration status from a registered investment advisor with the state of Arizona to a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC").

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of SWP.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm's name or our firm's CRD# 169248. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (480) 550-8555.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Scottsdale Wealth Planning, Inc. (“SWP” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commissions (“SEC”). SWP is organized as a Corporation under the laws of the State of Arizona in 2003. Mr. Ohanian has been conducting advisory services under the business name Scottsdale Wealth Planning, Inc. since 2003, but became a registered investment advisor in January 2014. SWP is owned and operated by Mr. Paul Ohanian, CFP®. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by SWP.

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

### **B. Advisory Services Offered**

SWP offers investment advisory services to individuals and high net worth individuals (each referred to as a “Client”).

#### Investment Management Services

SWP provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. SWP works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. SWP will then construct a portfolio, consisting of individual stocks and bonds, as well as diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also include commodities, options contracts, currencies, interest rate investments, REITs, Master Limited Partnerships (“MLPs”), private funds, closed-end funds, and other types of investments in Client portfolios, as appropriate, to meet the goals of a particular Client. Please see Item 8 for investment risks.

SWP’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. SWP will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

SWP evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. SWP may recommend, on occasion, redistributing investment allocations to diversify the portfolio. SWP may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time, will SWP accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. For additional information, please see Item 12 – Brokerage Practices and Item 15 – Custody.

#### Financial Planning Services

SWP will typically provide a variety of financial planning services to individuals and families, pursuant to a written financial planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client’s financial goals and objectives. This

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planning may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. SWP may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. The Advisor typically offers its Clients an ongoing financial planning engagement on a quarterly fee basis. Please see Item 5 for more details.

Financial planning recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

#### Commodities Accounts

Mr. Ohanian is also an associated person of CTAX Partners LLC ("CTAX"), a registered introducing broker (NFA ID: 0460576) with the National Futures Association ("NFA"). As a part of the Advisor's investment management services, Mr. Ohanian may recommend that the Client invest a portion of their assets into a commodities strategy, which will be managed separately by CTAX and not the Advisor. The Advisor will not have day-to-day investment supervision over the assets managed by CTAX. Clients are not obligated to implement commodities recommendations provided by Mr. Ohanian in this separate capacity.

#### Educational Workshops and Seminars

SWP hosts educational workshops and seminars about a variety of financial related topics. The workshops or seminars are not designed to provide specific and personal advice to a specific Client. Instead, as referenced by the title, the workshop or seminars are educational in nature and provide impersonal advice to attendees.

### **C. Client Account Management**

Prior to engaging SWP to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – SWP, in connection with the Client, will assist in developing investment goals and objectives and the strategies to achieve those goals.
- Asset Allocation – SWP will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – SWP will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – SWP will provide investment management and ongoing oversight of the Client's portfolio[s].

### **D. Wrap Fee Programs**

SWP does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by SWP.

## **E. Assets Under Management**

As of December 31, 2017, SWP managed approximately \$103,232,026 in assets, all of which are on a discretionary basis.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of SWP and the Client.

### **A. Fees for Advisory Services**

#### Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of each calendar quarter. Investment advisory fees are based on the following schedule:

Assets Under Management	Annual Rate
Up to \$1,000,000	1.50%
\$1,000,000 and Over	1.00%

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by SWP will be independently valued by the Custodian. SWP will not have the authority or responsibility to value portfolio securities. For certain Clients, financial planning fees are included as a part of its overall investment advisory fee.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Financial Planning Services

SWP typically offers initial financial planning services as a part of its investment advisory services at no cost to the Client. SWP also offers ongoing financial planning and support services for an annual fee, paid quarterly in advance. Annual fees for financial planning services are based upon advised assets of up to 1.00% or a fixed fee basis of up to \$10,000, depending on the nature and complexity of services, frequency of Client interactions and each Client's circumstances. Generally, the Advisor will impose a minimum fee of \$5,000 for financial planning services, which may be waived at the discretion of the Advisor. Fees may be reduced if the Advisor manages the Client's assets, pursuant to the financial planning agreement.

#### Educational Workshops and Seminars

At times, SWP may deliver educational seminars for Clients and prospective clients. SWP does not charge any fees for attending an educational seminar or workshop. Attendees are not required to become Clients of SWP.

### **B. Fee Billing**

#### Investment Management Services

Investment advisory fees are calculated by the Advisor and deducted from the Client's account[s] at the Custodian. The Advisor shall instruct the Custodian as to the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with SWP at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting SWP to be paid directly from their

accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Financial Planning Services

Financial planning fees are invoiced quarterly in advance and are due upon receipt.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than SWP, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian and executing broker-dealer (if separate). The investment advisory fee charged by SWP is separate and distinct from these custody and execution fees.

In addition, all fees paid to SWP for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of SWP, but would not receive the services provided by SWP which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by SWP to fully understand the total fees to be paid.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

SWP is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement with SWP, at any time, by providing advance written notice to the other party. In addition, the Client may terminate the investment management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### Financial Planning Services

Financial planning services, offered as an ongoing engagement, shall be perpetual in nature and will continue indefinitely, unless terminated by either the Advisor or the Client. Planning fees are generally collected in advance of the billing period, pursuant to the terms of the agreement. Either party may terminate a planning agreement, at any time, by providing advance written notice to the other party. In addition, the Client may terminate the agreement within five (5) business days of signing the Advisor's financial planning agreement at no cost to the Client. Upon termination, the Advisor will refund any unearned, prepaid fees on a pro rata basis. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

### **E. Compensation for Sales of Securities**

SWP does not buy or sell securities for commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above. Mr. Ohanian, in his separate capacity as an associated person of CTAX Partners LLC may receive additional compensation for the implementation of commodities and alternative investments. Please see Item 10 and Item 14.



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

SWP does not charge performance-based fees for its investment advisory services. The fees charged by SWP are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

SWP does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

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## **Item 7 – Types of Clients**

SWP provides investment advisory services to individuals and high net worth individuals. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. SWP generally requires a minimum relationship size of \$1,000,000, which may be waived at the sole discretion of the Advisor.

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

### **A. Methods of Analysis**

SWP primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from SWP is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, SWP generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. SWP will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, SWP may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. SWP will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in “Item 13 – Review of Accounts”.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.



The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with investments. The Advisor will assist the Client in fully understanding these investment risks.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Alternative Investments (Limited Partnerships) - The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

Currencies - Currency investments are subject to fluctuations in the value of the dollar against the currency invested of the country.

Interest Rates - Market value of interest rate investments may fluctuate which may cause the price of interest rates investments to fluctuate.

Closed-End Funds - Investments into Closed-End Funds often tend to be less liquid, which will reduce the ability to sell or exchange the asset, increasing the chances of losing its value when a sale is executed. Also Closed-End Funds often use leverage to increase volatility, which will increase the downside return potential.

Real Estate Investment Trusts (REITs) - Investments in REITs are associated with directly or indirectly with the value of real estate holdings. Risks can include the fluctuation of the property value, changes in interest rates, and the state of the economy.

Short Sales - A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

Frequent Trading - Frequent trading in securities can result in higher transaction costs in the Client's account[s]. For taxable accounts, frequent trading can also result in taxable transactions each year that would not be present in a buy-and-hold strategy. There are no guarantees that a frequent trading strategy will correctly time purchases and sales of any particular security.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving SWP or any of its Supervised Persons.** SWP and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 169248.

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

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### Insurance Agency Affiliations

Mr. Ohanian is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Ohanian's role with the Advisor. Mr. Ohanian may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Ohanian or the Advisor.

### Commodities Accounts

Mr. Ohanian is also an associated person of CTAX Partners LLC ("CTAX"), a registered introducing broker (NFA ID: 0460576) with the National Futures Association ("NFA"). As a part of the Advisor's investment management services, Mr. Ohanian may recommend that the Client invest a portion of their assets into a commodities strategy, which will be managed separately by CTAX and not the Advisor. The Advisor will not have day-to-day investment supervision over the assets managed by CTAX. Clients are not obligated to implement commodities recommendations provided by Mr. Ohanian in this separate capacity.

The additional compensation poses a conflict of interest whereby Mr. Ohanian has an incentive to recommend a commodities strategy as part of a Client's investment portfolio. Clients are not obligated to implement any recommendations provided by Mr. Ohanian.

### Succession Plan

As a fiduciary, Scottsdale Wealth Planning, Inc. has certain legal obligations, including the obligation to act in clients' best interest. Scottsdale Wealth Planning, Inc. maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel, due to disability or death. To that end, Scottsdale Wealth Planning, Inc. has entered into a succession agreement with Buckingham Asset Management, LLC, effective February, 2018. Scottsdale Wealth Planning, Inc. can provide additional information to any current or prospective client upon request to Paul C. Ohanian, Founder and Chief Executive Officer at (480) 550-8555 or [pohanian@scottsdalewealthplanning.com](mailto:pohanian@scottsdalewealthplanning.com).

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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### **A. Code of Ethics**

SWP has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with SWP (our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. SWP and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of SWP Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (480) 550-8555.

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## **B. Personal Trading with Material Interest**

SWP allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. SWP does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. SWP does not have a material interest in any securities traded in Client accounts.

## **C. Personal Trading in Same Securities as Clients**

SWP allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of SWP may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by SWP requiring reporting of personal securities trades by its Supervised Persons. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

## **D. Personal Trading at Same Time as Client**

While SWP allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time, will SWP, or any Supervised Person of SWP, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

SWP does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize SWP to direct trades to the Custodian as agreed in the investment advisory agreement. Further, SWP does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where SWP does not exercise discretion over the selection of the Custodian, it will recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by SWP and will not incur any extra fee or cost associated with using a custodian not recommended by SWP. However, the Advisor may not be able to deliver the same services to Client as provided to other Clients. SWP may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, location of the Custodian's offices and/or the services provided to the Advisor. SWP will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". SWP maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. SWP does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. SWP receives certain benefits in connection with its institutional relationship with Schwab. Please see Item 14 below.

**2. Brokerage Referrals** - SWP does not receive any compensation from any third-party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a “directed brokerage basis”, where SWP will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). SWP will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

#### **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. SWP will execute its transactions through the Custodian as authorized by the Client. SWP may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

### **Item 13 – Review of Accounts**

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#### **A. Frequency of Reviews**

Investments in Client accounts are monitored on a regular and continuous basis by Paul Ohanian, Founder, Chief Compliance Officer, and Chief Executive Officer of SWP. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

#### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A. above, each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account. The Client is encouraged to notify SWP if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

#### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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#### **A. Compensation Received by SWP**

SWP does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party, other than described below. SWP may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, SWP may receive referrals of new Clients from a third-party.

#### Insurance Agency Affiliations and Commodities Accounts

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7033 E. Main Street, #104, Scottsdale, AZ 85251  
Phone: (480) 550-8555 \* Fax: (480) 550-9555  
<http://www.scottsdalewealthplanning.com>

As noted in Item 10, Mr. Ohanian is a licensed insurance professional and may receive commissions for the implementation of insurance products. Mr. Ohanian will also receive additional compensation for the implementation of commodities in his separate role as an associated person of CTAX. Please see Item 10.

#### Participation in Institutional Advisor Platform

SWP has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like SWP. As a registered investment advisor participating on the Schwab Advisor Services platform, SWP receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services to SWP that may not benefit the Client, including: educational conferences and events and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. SWP believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

#### **B. Client Referrals from Solicitors**

SWP does not engage paid solicitors for Client referrals.

#### **Item 15 – Custody**

SWP does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct SWP to utilize the Custodian for the Client's security transactions. SWP encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

#### **Item 16 – Investment Discretion**

SWP has discretion over the selection and amount of securities to be bought or sold in a Client's account[s] without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified

investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by SWP. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by SWP will be in accordance with each Client's investment objectives and goals.

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

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SWP does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

#### **Item 18 – Financial Information**

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Neither SWP, nor its management, have any adverse financial situations that would reasonably impair the ability of SWP to meet all obligations to its Clients. Neither SWP, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. SWP is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 for services to be performed six months or more in advance.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Paul C. Ohanian, CFP®**  
**Founder, Chief Compliance Officer & Chief Executive Officer**

**Effective: May 21, 2018**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Paul C. Ohanian, CFP® (CRD# **1403229**) in addition to the information contained in the Scottsdale Wealth Planning, Inc. ("SWP" or the "Advisor") (CRD # 169248) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SWP Disclosure Brochure or this Brochure Supplement, please contact us at (480) 550-8555.

Additional information about Mr. Ohanian is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or Individual CRD# 1403229.

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Phone: (480) 550-8555 \* Fax: (480) 550-9555  
<http://www.scottsdalewealthplanning.com>



## Item 2 – Educational Background and Business Experience

Paul C. Ohanian, CFP®, born in 1958, is dedicated to advising Clients of SWP in his role as the Founder, Chief Compliance Officer & Chief Executive Officer. Mr. Ohanian earned a Bachelor of Science in Accounting from Southern Illinois University in 1982. Additional information regarding Mr. Ohanian's employment history is included below.

### Employment History:

Founder & Chief Compliance Officer, Scottsdale Wealth Planning, Inc.	01/2014 to Present
Associated Person, CTAX Partners LLC	05/2015 to Present
Registered Representative, BMA Securities, Inc	03/2008 to 01/2014
Investment Advisor Representative, Exeter Financial, LLC	02/2008 to 01/2014
Mass Transfer, AIG Financial Advisors, Inc	10/2005 to 03/2008
Investment Advisor Representative, WealthTrust - Arizona LLC	11/2006 to 02/2008
Associated Person, ANTC	06/2005 to 02/2008
Financial Advisor, Degreen Wealth Management Corp.	11/2005 to 11/2006
Financial Advisor, Degreen Financial, P.L.C.	09/2002 to 11/2005

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Ohanian.*** Mr. Ohanian has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Ohanian.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Ohanian.***

However, we do encourage you to independently view the background of Mr. Ohanian on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or Individual CRD# 1403229.

### **Item 4 – Other Business Activities**

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#### Insurance Agency Affiliations

Mr. Ohanian is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Ohanian's role with the Advisor. Mr. Ohanian may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Ohanian or the Advisor.

#### Commodities Accounts

Mr. Ohanian is also an associated person of CTAX Partners LLC ("CTAX"), a registered introducing broker (NFA ID: 0460576) with the National Futures Association ("NFA"). As a part of the Advisor's investment management services, Mr. Ohanian may recommend that the Client invest a portion of their assets into a commodities strategy, which will be managed separately by CTAX and not the Advisor. The Advisor will not have day-to-day investment supervision over the assets managed by CTAX. Clients are not obligated to implement commodities recommendations provided by Mr. Ohanian in this separate capacity.

The additional compensation poses a conflict of interest whereby Mr. Ohanian has an incentive to recommend a commodities strategy as part of a Clients investment portfolio. Clients are not obligated to implement any recommendations provided by Mr. Ohanian.

### **Item 5 – Additional Compensation**

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Mr. Ohanian has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Ohanian serves as the Founder, Chief Compliance Officer & Chief Executive Officer of SWP. Mr. Ohanian can be reached at (480) 550-8555.

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SWP has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SWP. Further, SWP is subject to regulatory oversight by various agencies. These agencies require registration by SWP and its Supervised Persons. As a registered entity, SWP is subject to examinations by regulators, which may be announced or unannounced. SWP is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor. have any additional information to disclose.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Rachael L. Hodyno  
Client Services Coordinator**

**Effective: May 21, 2018**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Rachael L. Hodyno (CRD# 6841577) in addition to the information contained in the Scottsdale Wealth Planning, Inc. ("Scottsdale" or the "Advisor", CRD# 169248) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Scottsdale Disclosure Brochure or this Brochure Supplement, please contact us at (480) 550-8555.

Additional information about Ms. Hodyno is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 6841577.

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Phone: (480) 550-8555 \* Fax: (480) 550-9555  
<http://www.scottsdalewealthplanning.com>

## Item 2 – Educational Background and Business Experience

Rachael L. Hodyno, born in 1976, is dedicated to advising Clients of Scottsdale as a Client Services Coordinator. Ms. Hodyno earned a Bachelor of Arts in History & Classics from McMaster University in 1999. Additional information regarding Ms. Hodyno's employment history is included below.

### Employment History:

Client Services Coordinator, Scottsdale Wealth Planning, Inc.	04/2016 to Present
Associated Person, CTAX Partners LLC	12/2014 to Present
Administrative Lead, Investor Services Exchange	01/2014 to 04/2016
Editor, JustAskBoo	11/2012 to 03/2014
CFO, Go Green Directories	06/2010 to 12/2013
Consultant, Reservoir Capital Group	06/2003 to 05/2010

## Item 3 – Disciplinary Information

***There are no legal, civil or disciplinary events to disclose regarding Ms. Hodyno.*** Ms. Hodyno has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Hodyno.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Hodyno.***

However, we do encourage you to independently view the background of Ms. Hodyno on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 6841577.

## Item 4 – Other Business Activities

### Commodities Accounts

Ms. Hodyno is also an associated person of CTAX Partners LLC ("CTAX"), a registered introducing broker (NFA ID: 0483218) with the National Futures Association ("NFA"). As a part of the Advisor's investment management services, Ms. Hodyno may recommend that the Client invest a portion of their assets into a commodities strategy, which will be managed separately by CTAX and not the Advisor. The Advisor will not have day-to-day investment supervision over the assets managed by CTAX. Clients are not obligated to implement commodities recommendations provided by Ms. Hodyno in this separate capacity.

The additional compensation poses a conflict of interest whereby Ms. Hodyno has an incentive to recommend a commodities strategy as part of a Clients investment portfolio. Clients are not obligated to implement any recommendations provided by Ms. Hodyno.

## Item 5 – Additional Compensation

Ms. Hodyno is dedicated to the investment advisory activities of Scottsdale's Clients. Ms. Hodyno does not receive any additional forms of compensation.

## Item 6 – Supervision

Ms. Hodyno serves as a Client Services Coordinator of Scottsdale and is supervised by Paul Ohanian, the Chief Compliance Officer. Mr. Ohanian can be reached at (480) 550-8555.

Scottsdale has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Scottsdale. Further, Scottsdale is subject to regulatory oversight by various agencies. These agencies require registration by Scottsdale and its Supervised Persons. As a registered entity, Scottsdale is subject to examinations by regulators, which may be announced or unannounced. Scottsdale is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: May 21, 2018

### Our Commitment to You

Scottsdale Wealth Planning, Inc. ("SWP" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. SWP (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

SWP does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.



### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> SWP does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where SWP or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> SWP does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (480) 550-8555.