

Strategic Wealth Designers, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Strategic Wealth Designers, LLC. If you have any questions about the contents of this brochure, please contact us at (502) 412-3354 or by email at: matt@swdgroup.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Strategic Wealth Designers, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Strategic Wealth Designers, LLC's CRD number is: 165474

500 N. Hurstbourne Parkway, Suite 120
Louisville, Kentucky, 40222
(502) 412-3354
matt@swdgroup.com
www.swdgroup.com

2716 Old Rosebud Road, Suite 180
Lexington, KY 40509

5181 Natorp Blvd, Suite 100
Mason, OH 45040

9850 Westpoint Dr., Suite 500
Indianapolis, IN 46256

2680 E. Main Street
Plainfield, IN 46168

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

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Strategic Wealth Designers, LLC. on 02/11/2019 are described below. Material changes relate to Strategic Wealth Designers, LLC.'s policies, practices or conflicts of interests.

- Strategic Wealth Designers, LLC has updated Item 5.A to remove reference to a one-time fee of \$250 to open an account.
- Client accounts and Financial Planning accounts are reviewed by a compliance representative of the firm. (Item 13.A)
- Strategic Wealth Designers, LLC has updated Item 12.A and Item 15 to remove reference to Fidelity Brokerage Services, LLC.
- Strategic Wealth Designers, LLC has updated Item 14.A to disclose that the firm does not receive any economic benefit, directly or indirectly from any third party for advice rendered to SWD clients.
- Strategic Wealth Designers, LLC has updated Item 14.A to disclose that the firm does not receive any economic benefit, directly or indirectly from any third party for advice rendered to SWD clients.
- Strategic Wealth Designers, LLC has updated Item 4 to add Dustin Stanley and Jordan Schwartz as owners of the firm.
- Strategic Wealth Designers, LLC has updated Item 19 to disclose that the firm has three management persons/executive officers; Matthew J Dicken, Dustin Stanley and Jordan Schwartz.
- Strategic Wealth Designers, LLC has updated their Assets Under Management (Item 4.E).
- Strategic Wealth Designers, LLC has updated their other office location (Front page).

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Item 4: Advisory Business

A. Description of the Advisory Firm

Strategic Wealth Designers, LLC is a Limited Liability Company organized in the state of Kentucky. The firm was formed in July of 2002 and began conducting investment advisory business in 2012. The principal owners are Matthew J. Dicken, Dustin Stanley, and Jordan Schwartz.

B. Types of Advisory Services

Strategic Wealth Designers, LLC (hereinafter "SWD") offers the following services to advisory clients:

Investment Supervisory Services

SWD offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. SWD creates an Investment Advisory Contract for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

SWD evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. SWD will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Advisory Contract, which is given to each client.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on hourly fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement.

Services Limited to Specific Types of Investments

SWD generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, ETFs, REITs, insurance products including annuities, and government securities. SWD may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

SWD offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Advisory Contract which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent SWD from properly servicing the client account, or if the restrictions would require SWD to deviate from its standard suite of services, SWD reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. SWD does not participate in any wrap fee programs.

E. Amounts Under Management

SWD has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$109,395,812.00	\$0.00	September 2019

Item 5: Fees and Compensation

A. Fee Schedule

Investment Advisory Services Fees

Total Assets Under Management	Annual Fee
First \$1,000,000	1.50%
\$1,000,001 - 2,499,999	1.00%
\$2,500,000 - \$4,999,999	0.75%
\$5,000,000 And Up	0.50%

These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are

paid quarterly in arrears to SWD, and clients may terminate their contracts with fifteen days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

Fees are withdrawn directly from the client's accounts with client written authorization. SWD will send an itemized fee invoice to the client. The invoice will detail the formula used to calculate the fee, assets under management the fee was based on, and the time period covered by the fee. In cases where client's fees are not withdrawn by the custodian, SWD will send invoice directly to clients and payment will be made to SWD via check.

Financial Planning Fees

Depending on the complexity of the situation and the needs of the client, the fee for financial planning services are negotiable and will be attached as Exhibit II of the Financial Planning Agreement. Fees are paid in advance, but never more than six months in advance. Clients may terminate their contracts without penalty within five business days of signing the Financial Planning Agreement. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the remaining percentage of the plan left to be completed.

In any educational seminar we may charge the client for printing and binding costs of the workbooks, other material costs or to recover a portion of venue rental cost. In these cases, the fee will be disclosed and collected before the event begins.

B. Payment of Fees

Payment of Investment Advisory Fees

Advisory fees are paid monthly in arrears to SWD and are typically withdrawn from the client's account with written authorization. In special circumstances or if requested by the client, advisory fees may be paid by check.

Payment of Financial Planning Fees

Payment of Financial Planning Fees may be paid via check, credit card or cash in advance, but never more than six months in advance. Fees charged in advance will be refunded based on the prorated amount of work completed at the point of termination. Material and event fees will not be refunded unless the event is not attended.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by SWD. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

SWD collects fees in advance and in arrears. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days

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during the billing period. Fees will be returned within fourteen days to the client via mailed check.

E. Outside Compensation For the Sale of Securities to Clients

Neither SWD nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

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

Item 7: Types of Clients

SWD generally provides investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities

Minimum Account Size

There is an account minimum, \$25,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

SWD's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

Charting analysis involves the use of patterns in performance charts. SWD uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

SWD uses long term trading and short-term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

SWD generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Mutual Funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns.

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Stocks & Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

REITs have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

Precious Metal ETFs (Gold, Silver, and Palladium Bullion backed "electronic shares" not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither SWD nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither SWD nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

SWD is a licensed insurance agency and Matthew J. Dicken, Dustin Stanley, Thomas Reilly, Robert De Lessio, & Jordan Schwartz are licensed insurance agents. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. SWD always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of SWD in such individuals' capacity as an insurance agent.

Jason Christopher Vander Pol is a 50% owner of VP Enterprises, Inc. which in turn operates a Supercuts franchise.

Walter Joseph Law III is a part time Loan Officer at Maxelle Mortgage.

Adele Emilia Guarino-Sanders is a realtor. She does not offer clients advice or products from this activity.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

SWD does not utilize nor select third-party investment advisers.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

SWD does not recommend that clients buy or sell any security in which a related person to SWD or SWD has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of SWD may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SWD to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SWD will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of SWD may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of SWD to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SWD will always transact client's transactions before its own when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodian, TD Ameritrade Institutional, a Division of TD Ameritrade, Inc., member FINRA/SIPC/NFA., was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. SWD will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

1. Research and Other Soft-Dollar Benefits

SWD receives no research, product, or services other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

2. Brokerage for Client Referrals

SWD receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

SWD will require clients to use a specific broker-dealer to execute transactions.

B. Aggregating (Block) Trading for Multiple Client Accounts

SWD maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing SWD the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed on a periodic basis by a compliance representative of the firm with regards to their investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon plan delivery by a compliance representative of the firm.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

SWD does not receive any economic benefit, directly or indirectly from any third party for advice rendered to SWD clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

SWD may make a contribution to a charity of the firm's choice when it receives referrals of new clients.

Item 15: Custody

SWD does not take custody of client accounts at any time. Custody of client's accounts is held primarily at TD Ameritrade Institutional, a Division of TD Ameritrade, Inc., member FINRA/SIPC/NFA. Clients will receive account statements from the custodian and should carefully review those statements.

SWD will have written authorization from the client to deduct advisory fees from the account. Each time a fee is directly deducted from the client accounts, SWD will send the qualified custodian notice of the amount of fee to be deducted. SWD will also send the client an invoice itemizing the fee, including the formula used to calculate the fee, the amount of assets under management that the fee is based on, and the time period covered by the fee. At least quarterly, the qualified custodian will send to the client an account statement identifying the amount of funds and each security in the accounts at the end of the period and setting forth all transactions in the account during that period.

Item 16: Investment Discretion

For those client accounts where SWD provides ongoing supervision, the client has given SWD written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides SWD discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

SWD will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

SWD does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither SWD nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

SWD has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

SWD currently has three management persons/executive officers; Matthew J. Dicken, Dustin Stanley and Jordan Schwartz. Their education and business backgrounds can be found on the Supplemental ADV Part 2B form.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Matthew J. Dicken's, Dustin Stanley's, and Jordan Schwartz's other business activities can be found on their respective Supplemental ADV Part 2B forms.

C. How Performance Based Fees are Calculated and Degree of Risk to Clients

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

D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at SWD or SWD has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

**E. Material Relationships That Management Persons Have With
Issuers of Securities (If Any)**

Neither SWD, nor its management persons, has any relationship or arrangement with issuers of securities.