

# Strategic Wealth Investment Group, LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Strategic Wealth Investment Group, LLC. If you have any questions about the contents of this brochure, please contact us at (502) 412-3354 or by email at: [matt@SWGgroup.com](mailto:matt@SWGgroup.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 Investment Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Strategic Wealth Investment Group, LLC's CRD number is: 165474*

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

Version Date: March 21, 2022

## Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Strategic Wealth Investment Group, LLC. On 03/03/2021 are described below. Material changes relate to Strategic Wealth Investment Group, LLC.'s policies, practices or conflicts of interests.

- Strategic Wealth Investment Group, LLC has added the DOL Written Acknowledgement of Fiduciary Status (Item 4).
- Strategic Wealth Investment Group, LLC has updated Other Financial Industry Activities and Affiliations (Item 10C).
- Strategic Wealth Investment Group, LLC has updated its fee schedule under Item 5 A
- Strategic Wealth Investment Group, LLC has updated Item 11 B

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Strategic Wealth Investment Group, 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 Investment Group, LLC (hereinafter "SWIG") offers the following services to advisory clients:

#### *Investment Supervisory Services*

SWIG offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. SWIG 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 | • Personal investment policy   |
| • Asset allocation    | • Asset selection              |
| • Risk tolerance      | • Regular portfolio monitoring |

SWIG evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. SWIG 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*

SWIG 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. SWIG may use other securities as well to help diversify a portfolio when applicable.

## ***Written Acknowledgement of Fiduciary Status***

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

### **C. Client Tailored Services and Client Imposed Restrictions**

SWIG 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 SWIG from properly servicing the client account, or if the restrictions would require SWIG to deviate from its standard suite of services, SWIG 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. SWIG does not participate in any wrap fee programs.

### **E. Amounts Under Management**

SWIG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$490,119,220	\$0.00	December 2021

## **Item 5: Fees and Compensation**



## **A. Fee Schedule**

### ***Investment Advisory Services Fees***

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
Up to \$500,000	1.75%
\$500,001 - \$999,999	1.50%
\$1,000,000 - \$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 monthly in arrears to SWIG, 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.

### ***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 SWIG and are typically withdrawn from the client's account with written authorization.

### ***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 SWIG. Please see Item 12 of this brochure regarding broker/custodian.

### **D. Prepayment of Fees**

SWIG 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 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 SWIG 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**

SWIG 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**

SWIG 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*

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

*Charting analysis* involves the use of patterns in performance charts. SWIG 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*

SWIG 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**

SWIG 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 SWIG 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 SWIG 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**

SWIG is a licensed insurance agency, and all of our financial advisors 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. SWIG 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 SWIG in such individuals' capacity as an insurance agent.

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Matthew J. Dicken is a Board Member of SoWise Financial (AI Technology Company) and provides consulting.

Matthew J. Dicken, as the President of Strategic Wealth Aviation, LLC, a syndicate for private investments, manages and operates the business.

The principals of SWIG are also the principals of the PRIVATE FUND Total Return Capital Management, LLC (the Fund). SWIG and our affiliates are not restricted from forming additional investment funds, entering into other investment advisory relationships or engaging in other business activities. Potentially, such activities could be viewed as creating a conflict of interest in that the time and effort of our management personnel and employees will not be devoted exclusively to the business of SWIG, but could be allocated between the business of the Fund and other of our business activities and those of our affiliates.

Investments in the Fund may be recommended to advisory clients for whom a partnership investment may be more suitable than would a separate advisory account managed by our firm. SWIG Clients who invest in the Fund are not charged any additional advisory fees other than the advisory fee allocated to the limited partners of the Fund.

The Fund is not required to register as an investment company under the Investment Company Act of 1940 in reliance upon an exemption available to funds whose securities are not publicly offered. The Fund is managed on a discretionary basis in accordance with the terms and conditions of its offering and organizational documents.

Matthew J. Dicken, as the President of Retirement Planning University, Inc., which provides retirement and education classes, manages, and operates the business.

Matthew J. Dicken is President of Strategic Wealth Property & Casualty insurance agency.

Matthew J. Dicken as President of Strategic Wealth Intellectual Property, manages and operates the business.

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

SWIG 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,

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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**

As noted above in Item 10, SWIG may recommend securities in which related persons to SWIG have a material financial interest.

The Code requires personnel to disclose any and all material financial interests as part of the ongoing compliance process. Clients may receive recommendations to buy securities where a material financial interest exists.

## **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of SWIG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SWIG 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. SWIG 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 SWIG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of SWIG 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. SWIG 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. SWIG will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

#### **1. *Research and Other Soft-Dollar Benefits***

SWIG 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***

SWIG 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***

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

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

SWIG maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing SWIG 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)**

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

### **B. Compensation to Non - Advisory Personnel for Client Referrals**

SWIG may offer nominal non-cash compensation (typically a restaurant gift card) when it receives referrals of new clients. The total dollar amount offered to any client for referrals in a calendar year shall not conflict with the de minimis amount identified in the Firm's Code of Ethics.

## **Item 15: Custody**

SWIG 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.

SWIG 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, SWIG will send the qualified custodian notice of the amount of fee to be deducted. 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 SWIG provides ongoing supervision, the client has given SWIG 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 SWIG 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)**

SWIG 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**

SWIG does not require nor solicit prepayment of more than \$1,200 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 SWIG 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**

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