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Part 2A of Form ADV

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This brochure provides information about the qualifications and business practices of Capital Design Private Wealth LLC. If you have any questions about the contents of this brochure, please contact us at 603-534-2089 or at [info@capitaldesignpw.com](mailto:info@capitaldesignpw.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. Registration as an investment adviser, either with the SEC or with a state securities authority, does not imply a certain level of skill or training.

Additional information about Capital Design Private Wealth LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Capital Design Private Wealth LLC's CRD number is 300472.

## Item 2 - Material Changes

Since our most recent annual update of this brochure (dated January 31, 2023), the following are noted as material changes:

- CDPW have added 55ip as a model portfolio manager
- On September 5, 2023, the transition of client accounts from TD Ameritrade to Charles Schwab was largely completed. “Item 12 – Brokerage Practices” has been updated to reflect the selection, use, and recommendation of Charles Schwab as a broker-dealer/custodian for client accounts and securities transactions.
- “Item 10 – Other Financial Industry Activities and Affiliations” has been updated. Nicholas Drew is the owner of Drew Wealth Management.

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## Item 4 - Advisory Business

### Firm Description

Capital Design Private Wealth LLC (“Capital Design” or the “Advisor”) is a limited liability company registered as an investment advisor with the SEC (as of January 2023). Capital Design was founded in January 2019 and is owned and operated by Andre N. LaPlante (Partner and Chief Compliance Officer), Hilton J. Kelly (Partner), and Nicholas Drew (Partner). This disclosure brochure provides information regarding the qualifications, business practices, and the advisory services provided by Capital Design.

We provide the following investment advisory services.

### Investment Management Services

Capital Design provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Capital Design works closely with Clients to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Capital Design will then construct an investment portfolio, consisting of low-cost, diversified mutual funds and/or exchange traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, closed end funds, or certificates of deposits to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy portfolio construction.

On certain occasions Capital Design may outsource investment selection and portfolio construction to 55ip, an unaffiliated investment advisor. Capital Design performs due diligence on all outside managers to review model portfolios remain aligned with Capital Designs investment strategy.

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

Capital Design evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Capital Design may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Capital Design may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend

employing cash positions as a possible hedge against market movement. Capital Design may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet the Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Clients who have 55ip as an outside portfolio will have investments selection and allocation performed by the outside manager. Capital Design monitors and reviews all selections and allocations before implementing the portfolio for adherence to Capital Design investment guidelines.

At no time will Capital Design accept or maintain custody of a Client's funds or securities. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement. Please see "Item 12 – Brokerage Practices" and "Item 15 - Custody."

## Financial Planning Services

Pursuant to a written agreement, Capital Design will typically provide a variety of financial planning and consulting services to Clients. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial circumstances.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting 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, or a financial consultation rendered to, 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.

Capital Design may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are completed within six (6) months of the contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a 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 execute the transaction through the Advisor.

## Wrap-Fee Program

Capital Design Private Wealth does not sponsor or participate in a wrap-fee program.

## Assets Under Management

As of August 19, 2024, Capital Design Private Wealth had approximately \$153,265,000 in discretionary assets under management and \$0 in non-discretionary assets under management.

## Item 5 - Fees and Compensation

The following paragraphs describe the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for the services described herein shall be required to enter into a written agreement with the Advisor.

### Fees for Investment Management Services

Investment advisory fees are paid monthly, in advance, pursuant to the terms of the agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar month. Investment advisory fees range from 0.50% to 1.50% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first month of service is prorated from the inception date of the account[s] to the end of the first month. 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 the Advisor. All securities held in accounts managed by Capital Design will be independently valued by the Custodian. Capital Design will not have the authority or responsibility to value portfolio securities.

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.

## Fees for Financial Planning Services

Capital Design offers financial planning services through an ongoing annual retainer or fixed fee engagement. Ongoing planning engagements may be offered at a fixed annual fee range of \$900 - \$5,000 billed monthly in advance. An estimate for fixed fee engagements will be provided to the Client prior to engaging for these services. Fees are negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor.

## Fee Billing

For our investment management services, investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective month. The amount due is calculated by applying the monthly rate (annual rate divided by (12) to the total assets under management with Capital Design at the end of the prior month. Account statements, sent by the custodian no less than quarterly, will reflect the deduction of the investment advisory fee.

In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the 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 Capital Design to be paid directly from one of their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

For our financial planning services, fees for ongoing planning engagements are invoiced monthly in advance as part of the financial planning agreement. Financial Planning fees for fixed fee engagements are invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverables. The Advisor will invoice Clients directly for its financial planning services.

## Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Capital Design, in connection with investments made on behalf of the Client's accounts. The Client is responsible for all custody and securities execution fees charged by the Custodian. The fees charged by Capital Design are separate and distinct from these custody and execution fees.



In addition, all fees paid to Capital Design 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 could invest in these products directly, without the services of Capital Design, but would not receive the services provided by Capital Design 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 and the fees charged by Capital Design to fully understand the total fees to be paid. Please refer to "Item 12 – Brokerage Practices" for additional information.

### Advance Payment of Fees and Termination

For its investment management services, Capital Design is compensated for its services in advance of the month in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory 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. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the month.

For its financial planning services, Capital Design requires an advance deposit as described above. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may also terminate the financial planning 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 Client shall be billed for the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior written consent.

### Compensation for Sales of Securities

Capital Design does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account.

### Additional Information

Pre-existing advisory clients are subject to Capital Design's advisory fees in effect at the time the client enters the advisory relationship. Therefore, advisory fees will differ among clients.

Clients should note that similar advisory services may or may not be available from other registered (or unregistered) investment advisers for similar or lower fees. Certain clients whose managed assets are not custodied at Charles Schwab may be charged fees in arrears for investment supervisory services depending on the platform provider.

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

Capital Design Private Wealth does not accept or charge performance-based fees or any fees based on a share of capital gains or on capital appreciation.

## Item 7 - Types of Clients

Capital Design offers investment advisory services to individuals, high net worth individuals, trusts, estates and retirement plans. Capital Design generally does not impose a minimum relationship size.

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

### Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

*Fundamental Analysis.* We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

*Technical Analysis.* We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk that a poorly managed or financially unsound company may underperform regardless of market movement.

*Asset Allocation.* Rather than focusing primarily on securities selection, we generally attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance. A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry, or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

*Mutual Fund and/or ETF Analysis.* We look at the experience and track record of the managers of the mutual fund or ETF to determine if the managers have demonstrated an ability to invest over a period and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF to determine if there is significant overlap in the underlying investments held in other fund(s) in the client's portfolio. We also monitor the funds or ETFs to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

*Third-Party Money Manager Analysis.* We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

*Risks for all forms of analysis.* Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and

unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## Investment Strategies

As noted above, Capital Design generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Capital Design 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, Capital Design 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.

***Long-term purchases.*** We purchase securities with the idea of holding them in the client's account for a year or longer. A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

***Short-term purchases.*** When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

## Risk of Loss.

Securities investments are not guaranteed, and you may lose money on your investments. Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.

Investors face the following investment risks:

***Interest-rate Risk*** - Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

***Market Risk*** - The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances. For example, political, economic, and social conditions may trigger market events.

*Inflation Risk* - When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

*Currency Risk* - Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

*Reinvestment Risk* - This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.

*Business Risk* - These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

*Liquidity Risk* - Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

*Financial Risk* - Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

### Mutual Fund Securities

Investing in mutual funds carries inherent risk. The major risks of investing in a mutual fund include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have growth, the amount of individual company diversification, the type and amount of industry diversification, and the type and amount of sector diversification within specific industries. In addition, mutual funds tend to be tax inefficient and therefore investors may pay capital gains taxes on fund investments while not having yet sold the fund.

### Exchange-Traded Funds ("ETFs")

ETFs are investment companies whose shares are bought and sold on a securities exchange. An ETF holds a portfolio of securities designed to track a specific market segment or index. The funds could purchase an ETF to gain exposure to a portion of the U.S. or foreign market. The funds, as a shareholder of another investment company, will bear their pro-rata portion of the other investment company's advisory fee and other expenses, in addition to their own expenses. Investing in ETFs

involves risk. Specifically, ETFs, depending on the underlying portfolio and its size, can have wide price (bid and ask) spreads, thus diluting or negating any upward price movement of the ETF or enhancing any downward price movement. Also, ETFs require more frequent portfolio reporting by regulators and are thereby more susceptible to actions by hedge funds that could have a negative impact on the price of the ETF. Certain ETFs may employ leverage, which creates additional volatility and price risk depending on the amount of leverage utilized, the collateral and the liquidity of the supporting collateral. Further, the use of leverage (i.e., employ the use of margin) generally results in additional interest costs to the ETF. Certain ETFs are highly leveraged and therefore have additional volatility and liquidity risk. Volatility and liquidity can severely and negatively impact the price of the ETF's underlying portfolio securities, thereby causing significant price fluctuations of the ETF.

### Equity Securities

Investing in individual companies involves inherent risk. The major risks relate to the company's capitalization, quality of the company's management, quality and cost of the company's services, the company's ability to manage costs, efficiencies in the manufacturing or service delivery process, management of litigation risk, and the company's ability to create shareholder value (i.e., increase the value of the company's stock price). Foreign securities, in addition to the general risks of equity securities, have geopolitical risk, financial transparency risk, currency risk, regulatory risk and liquidity risk.

### Fixed Income Securities

Fixed income securities carry additional risks than those of equity securities described above. These risks include the company's ability to retire its debt at maturity, the current interest rate environment, the coupon interest rate promised to bondholders, legal constraints, jurisdictional risk (U.S or foreign) and currency risk. If bonds have maturities of 10 years or greater, they will likely have greater price swings when interest rates move up or down. The shorter the maturity the less volatile the price swings. Foreign bonds have liquidity and currency risk.

## Item 9 - Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Additionally, Clients may also obtain information relating to the disciplinary history of any investment advisor representative conducting business in Massachusetts by contacting the Commonwealth of Massachusetts Securities Division at (617) 727-3548.

## Item 10 - Other Financial Industry Activities and Affiliations

No Capital Design employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Capital Design employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Nicholas Drew is the owner of Drew Wealth Management. Drew Wealth Management is a newly formed entity registered as an investment adviser with the state of New Hampshire and other jurisdictions.

Capital Design only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

## Item 11 - Code of Ethics

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. Our firm and its personnel have a duty of loyalty, fairness, and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Our code also provides for oversight, enforcement, and recordkeeping provisions.

Our Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

Capital Design allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Capital Design does not act as the principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an

investment company. Capital Design does not have a material interest in any securities traded in Client accounts.

A copy of our Code of Ethics is available to our advisory clients and prospective clients upon request.

Additionally, because we may provide you investment advice pertaining to employee benefit plans, such as 401Ks, and individual retirement plans (IRAs)s, we must acknowledge our fiduciary status in writing under Title I of ERISA and the Internal Revenue Code, as applicable, when providing that advice. The following represents our 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.

## Item 12 - Brokerage Practices

### Recommendation of Custodians

Capital Design 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 Capital Design to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Capital Design does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Specific custodian or brokerage recommendations are made to clients based on their need for such services. We recommend custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at reasonable commission rates, industry reputation, and the quality of client service. Among the factors we look at in recommending the use of a broker-dealer/custodian, we seek one who will hold your assets and execute transactions on terms that are generally most



advantageous when compared to other available providers. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services;
- Capability to execute, clear, and settle securities transactions;
- Breadth of available investment products;
- Competitiveness of the price of the services;
- Reputation, financial strength, and stability;
- Prior service to us and our other clients.

Capital Design recommends that our clients use Charles Schwab Institutional, a division of Charles Schwab & Co., Inc. (“Charles Schwab” or “Schwab”). Charles Schwab is an independent and unaffiliated SEC-registered broker-dealer and member of both the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Charles Schwab is owned by Schwab Holdings, Inc.

We are independently owned and operated and are not affiliated with Charles Schwab. Charles Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them.

### Soft Dollars

Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealers/custodian in exchange for research and other services. Capital Design does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14.

Schwab provides Capital Design with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis. These services may be contingent upon Capital Design committing to Schwab a specific amount of business (assets in custody or trading commissions). Schwab’s brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Capital Design client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

## Directed Brokerage

All Clients are serviced on a “directed brokerage basis,” where Capital Design will place trades within the established account at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account. 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). Capital Design 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 designated Custodian. The Advisor may not be able to aggregate orders to reduce transaction costs in a Client directed brokerage account.

## Aggregation of Orders

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results considering such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Capital Design will execute its transactions through the Custodian as authorized by the Client. Capital Design may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. 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

## Item 13 - Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by Andre LaPlante, Chief Compliance Officer of Capital Design. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

In addition to the investment monitoring noted above, each Client account shall be reviewed at least annually. Reviews may be conducted more 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[s]. The Client is encouraged to notify Capital Design 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.

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. Clients’ 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. However, any reports provided by Capital Design are provided as a service only and are not account statements and should not be used as such.

## Item 14 - Client Referrals and Other Compensation

No one who is not a client provides an economic benefit to us for providing investment advice or other advisory services to you. Additionally, neither Capital Design nor its personnel receive or give compensation in exchange for client referrals.

## Item 15 - Custody

We do not accept custody of any securities or investment assets. These will be held by a custodian. We do not prepare or send any account statements. Account statements are sent directly to clients by the custodian of the assets.

In Item 5 (“Fees and Compensation”), we disclosed that we directly debit advisory fees from client accounts. As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. Quarterly, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we may send reports directly to our clients upon request. We urge our clients to carefully compare the information provided in these reports to ensure that all account transactions, holdings, and values are correct and current.

## Item 16 - Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell;
- determine the dollar amount of the security to buy or sell.

Clients give us discretionary authority when they sign an investment advisory agreement with us.

## Item 17 - Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Clients maintain exclusive responsibility for directing the way proxies solicited by issuers of securities beneficially owned by the client shall be voted and making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. We do not offer any consulting assistance regarding proxy issues to clients.

## Item 18 - Financial Information

Under no circumstances do we require or solicit payment of fees of more than \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a balance sheet.

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. We have no financial commitments that would impair our ability to meet contractual and fiduciary commitments to clients.

Neither Capital Design Private Wealth LLC nor any of its principals were the subject of a bankruptcy petition within the past ten years.

## ADV Part 2B (Brochure Supplement)

Andre N. LaPlante

Capital Design Private Wealth LLC  
36 Maplewood Ave.  
Portsmouth, NH 03801  
Phone: 603-610-8290

August 26, 2024

This brochure supplement provides information about Andre N. LaPlante that supplements Capital Design Private Wealth LLC's brochure. You should have received a copy of that brochure. Please contact us at 603-610-8250 or [info@capitaldesignpw.com](mailto:info@capitaldesignpw.com) if you did not receive Capital Design Private Wealth LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Andre N. LaPlante is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The CRD number for Andre N. LaPlante is 5781133.

## Andre N. LaPlante

### Item 2 - Educational Background and Professional Qualifications

Andre N. LaPlante, born in 1985, is dedicated to advising Clients of Capital Design as a Partner and Chief Compliance Officer. Mr. LaPlante earned a Master's in Business Administration from Arizona State University in 2015. Mr. LaPlante earned a Bachelor's in Economics from the University of Maine in 2008. Additional information regarding Mr. LaPlante's business experience is included below.

### Business Experience

- February 2019 – Present
  - Investment Adviser Representative, Partner, and Chief Compliance Officer – Capital Design Private Wealth LLC.
- March 2015 – February 2019
  - Financial Advisor – Roger A. Auger & Associates

### Item 3 - Disciplinary Information

There is no disciplinary information to report.

### Item 4 - Other Business Activities

Andre N. LaPlante has no other business activities.

### Item 5 - Additional Compensation

Andre N. LaPlante receives no additional compensation from any source concerning advisory services offered by him or Capital Design Private Wealth.

### Item 6 - Supervision

Mr. LaPlante serves as a Partner and Chief Compliance Officer of Capital Design and is supervised by Hilton Kelly, Owner. Mr. Kelly can be reached at (603) 610-8250.

## ADV Part 2B (Brochure Supplement)

Hilton J. Kelly  
Capital Design Private Wealth LLC  
36 Maplewood Ave.  
Portsmouth, NH 03801  
Phone: 603-610-8290

August 26, 2024

This brochure supplement provides information about Hilton J. Kelly that supplements Capital Design Private Wealth LLC's brochure. You should have received a copy of that brochure. Please contact us at 603-610-8250 or [info@capitaldesignpw.com](mailto:info@capitaldesignpw.com) if you did not receive Capital Design Private Wealth LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Hilton J. Kelly is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The CRD number for Hilton J. Kelly is 4303042.

## Hilton J. Kelly

### Item 2 - Educational Background and Professional Qualifications

Hilton J. Kelly, born in 1971, is dedicated to advising Clients of Capital Design as a Partner. Additional information regarding Mr. Kelly's employment history is included below.

### Business Experience

- February 2019 – Present
  - Investment Adviser Representative/Partner– Capital Design Private Wealth LLC.
- February 2005 – February 2019
  - Financial Advisor – Roger A. Auger & Associates

### Item 3 - Disciplinary Information

There is no disciplinary information to report.

### Item 4 - Other Business Activities

Hilton J. Kelly has no other business activities.

### Item 5 - Additional Compensation

Hilton J. Kelly receives no additional compensation from any source concerning advisory services offered by him or Capital Design Private Wealth.

### Item 6 - Supervision

Mr. Kelly serves as a Partner of Capital Design and is supervised by Andre LaPlante, the Chief Compliance Officer. Andre LaPlante can be reached at (603) 610-8250.



## ADV Part 2B (Brochure Supplement)

Nicholas Drew  
Capital Design Private Wealth LLC  
36 Maplewood Ave.  
Portsmouth, NH 03801  
Phone: 603-610-8290

October 7, 2024

This brochure supplement provides information about Nicholas Drew that supplements Capital Design Private Wealth LLC's brochure. You should have received a copy of that brochure. Please contact us at 603-610-8250 or [info@capitaldesignpw.com](mailto:info@capitaldesignpw.com) if you did not receive Capital Design Private Wealth LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Nicholas Drew is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The CRD number for Nicholas Drew is 5672296.

## Nicholas Drew

### Item 2 - Educational Background and Professional Qualifications

Nicholas Drew, born in 1987, is dedicated to advising Clients of Capital Design as a Partner. Additional information regarding Mr. Drew's employment history is included below

### Business Experience

- October 2024 – Present
  - Owner and investment adviser representative – Drew Wealth Management
- June 2021 – Present
  - Investment Adviser Representative – Capital Design Private Wealth LLC.
- July 2018 – June 2021
  - Financial Advisor – Fidelity Personal and Workplace Advisors

### Item 3 - Disciplinary Information

There is no disciplinary information to report.

### Item 4 - Other Business Activities

Nicholas Drew is the owner and an investment adviser representative of Drew Wealth Management. Drew Wealth Management is an investment advisor registered in the state of New Hampshire and other jurisdictions as needed. Drew Wealth Management is not affiliated with Capital Design Private Wealth.

### Item 5 - Additional Compensation

Nicholas Drew receives no additional compensation from any source concerning advisory services offered by him or Capital Design Private Wealth.

### Item 6 - Supervision

Mr. Drew serves as a Partner of Capital Design and is supervised by Andre LaPlante, the Chief Compliance Officer. Andre LaPlante can be reached at (603) 610-8250.