

UP Strategic Wealth Investment Advisors, LLC d.b.a Steel Tower Investments (Steel Tower) is a registered investment advisor (RIA) with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [www.Investor.gov/CRS](http://www.Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

**What investment services and advice can you provide me?** We offer investment advisory services to retail investors. Below is a summary of our principal services we offer to retail investors.

**Investment Management:** Our main business is providing investment management services where we learn your circumstances and goals, create portfolios to fit your goals, then monitor and manage the portfolio performance on a continuing basis and as circumstances warrant. The scope of the assets managed and services provided is defined by our agreement with you. In most cases, we have discretionary authority to make investment decisions and conduct trades. You can limit such authority where you make the final decision and approve any trades. We are an independent advisor and do not sell any proprietary products. We are not limited to, and do not specialize in, any investments or strategies. We do offer model portfolios which are designed by an affiliate entity, and are adjusted and rebalanced periodically. There are no account minimums for our services.

**Financial Planning:** We offer financial planning services as part of investment management, or as a stand-alone service. A financial plan is a review of your situation designed to help you plan to reach your financial goals. Financial plans can be comprehensive or limited in scope.

**Other Financial Services:** We may provide services other than those listed above if requested by the client and agreed to by us.

More information about our services, our types of clients, and minimum account requirements and fees can be found in our Form ADV Part 2A Items 4, 7, and 8 by clicking this link <https://adviserinfo.sec.gov/firm/brochure/166742>.

**Questions To Ask Us:** Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

**What fees and expenses will I pay?** The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services.

**Investment Management Fees:** You pay investment management fees based on a percentage of assets under management. The fee is paid quarterly based upon the market value of the assets on the last day of the previous quarter. Management fees may include fees for sub-advisors, overlay managers or third-party service providers which can be in addition to our fees. The more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account.

**Financial Planning:** Financial planning fees are charged in various ways including fixed and hourly fees for one-time plans. Ongoing planning services can be charged periodically as a fixed fee or as a percentage of assets involved. We determine the fees on a case-by-case basis.

**Custodial, Transaction and Other Fees:** Your assets that we manage will be held at third-party custodians who charge fees for maintaining the accounts and effecting securities transactions. You will also pay management fees and expenses for mutual funds and exchange traded funds held in your account. These fees and expenses are in addition to any fees charged by us.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For details information, refer to our Form ADV Part 2A, Items 5 by clicking this link

<https://adviserinfo.sec.gov/firm/brochure/166742>

Questions to Ask Us: Help me understand how these fees and costs might affect my investments.

If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

**What Are Your Legal Obligations To Me When Acting As My Investment Advisor? How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?** When we act as your investment advisor, we have to act in your best interests and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Our receipt of any fees or benefits creates an inherent conflict of interest since we have the incentive to recommend actions which increase our revenue.

**Affiliate Relationships:** We have several affiliates conducting business including investment advisory, securities brokerage, accounting, and insurance. Some of our advisors may conduct business with some of these affiliates. The recommendation that you use the services of, or purchase a product from, one or more of these affiliates creates a conflict of interest as we may benefit financially. We do not have any proprietary products.

**Receipt of Benefits:** We receive support services, products and benefits from third parties that assist us in conducting business and servicing clients. The receipt of these benefits creates the incentive to use the products or services of the entity providing the benefits.

**Rollovers:** If we recommend that you roll over your retirement plan assets into an account managed by us, this creates a conflict of interest as we will earn fees as a result of the rollover.

Question to Ask Us: How might your conflicts of interest affect me, and how will you address them?

**How do your financial professionals make money?** Our financial advisors are paid a salary plus a discretionary bonus determined by the firm. The bonus is based on numerous factors including the amount of revenue they generate, the quality and amount of other work performed, and other factors deemed relevant by management. Financial advisors may also be eligible for profit sharing and partially paid benefits such as health, disability and life insurance.

**Do you or your financial professionals have legal or disciplinary history?** No for our firm. Yes for our financial professionals. These events are disclosed in either our Form ADV or the specific individual's U4. These documents can be found by going to [Investor.gov/CRS](https://investor.gov/CRS).

Questions to Ask Us: As a financial professional, do you have any disciplinary history? For what type of conduct?

**Where Can I Find Additional Information About Steel Tower And Its Financial Advisors?** You can find additional information about our investment advisory services and request a copy of the relationship summary at (412) 586-2060 or click the link provided <https://adviserinfo.sec.gov/firm/brochure/166742>.

Questions to Ask Us: Who is my primary contact person?

Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?