

FINANCIAL DESIGNS

W E A L T H

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Part 2A of Form ADV
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This Form ADV Part 2A ("Brochure") provides information about the qualifications and business practices of Financial Designs Wealth Management, LLC ("FD Wealth") (CRD #314520). If you have any questions about the contents of this Brochure, please contact us at 786-388-0030, or via email at info@fdwealth.net. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Additional information about FD Wealth is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

This item provides a summary of specific material changes that have been made to this Brochure

Since our last filing in September 2023, in addition to editing and formatting changes, we have made the following updates:

- We updated the suite number of our physical address on the cover page of this Brochure.
- Items 4 and 10 are being updated to remove information regarding an arrangement with DPL Financial Partners, LLC, an unaffiliated service provider.
- Item 5 was amended to provide clarification regarding conflicts related to recommendations for clients to purchase or exchange commission free annuities managed by FD Wealth and to clarify that the 401K recordkeeper/administrator's billing process may be different from FD Wealth's.
- Item 14 is being updated to provide clarification regarding the referral arrangement with our affiliate.

We will provide you with a new Brochure whenever there are material changes to the information contained in this Brochure. You may obtain a copy of our most recent Brochure, at any time, without charge, by contacting us at info@fdwealth.net. In addition, the most recent version of our Brochure, is publicly available on the SEC's website www.adviserinfo.sec.gov.

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Form ADV Part 2B Brochure Supplement(s) are provided separately to clients.

Item 4: Advisory Business

Financial Designs Wealth Management, LLC, ("FD Wealth," the Advisor or "the Firm") was organized on April 15, 2021, as a Florida LLC. FD Wealth is owned by Jorge Valdes and Jennifer Valdes. FD Wealth offers wealth management services to individuals, high net worth individuals, trusts, corporations, and retirement plan sponsors. At the start of the relationship, FD Wealth's advisors will meet with clients to determine their financial needs and goals and design a personalized investment strategy that includes the selection of third-party money managers, and/or Separately Managed Accounts ("SMAs"). FD Wealth offers discretionary or non-discretionary portfolio management. Client assets will be invested in a wide range of products including U.S. and international stocks, bonds, Exchange Traded Funds ("ETFs"), mutual funds and where appropriate, alternative investments.

Clients will sign an Investment Management Agreement that sets forth the terms and conditions of the engagement and other important disclosures. The Investment Management Agreement will be effective upon acceptance by the client, FD Wealth, and the custodian. We will only provide investment management supervision to client assets listed in the Investment Management Agreement.

Selection of Other Investment Advisers /Independent Third-Party Managers

FD Wealth will use one or more independent third-party managers as sub advisers. Clients will enter into a separate written agreement with the independent third-party manager and will receive the independent third-party manager's Brochure, Form CRS (Client Relationship Summary) and other pertinent disclosure documents.

On an ongoing basis, FD Wealth will monitor the performance of accounts managed by third party-managers. FD Wealth seeks to ensure that the third-party manager's strategies and target allocations remain aligned with our clients' investment objectives.

Pension Consulting Services

FD Wealth offers pension consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan and the services requested by the plan sponsor or named fiduciary. In general, these services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options consistent with the parameters set forth in the plan documents, education services to plan participants, investment performance monitoring, and/or ongoing consulting. Pension consulting services will generally be non-discretionary and advisory in nature. The ultimate decision to act on behalf of the plan shall remain with the plan sponsor or other named fiduciary.

We may also assist with participant enrollment meetings and provide investment-related educational sessions to plan participants on such topics as: asset allocation, diversification, risk tolerance and investment time horizons. Our educational sessions may also include other investment-related educational topics applicable to the particular plan. FD Wealth may also provide additional types of pension consulting services to plans on an individually negotiated basis. We will provide the plan fiduciaries with a written document that lists all agreed to services and fees.

Retirement Account Rollovers

We offer recommendations and advice concerning employer retirement plan or other qualified retirement accounts. Our recommendations may generally include that the client consider withdrawing the assets from his/her employer's retirement plan or other qualified retirement account and roll the assets over to an Individual Retirement Accounts ("IRA") or other qualified investment vehicle. If a client elects to roll the assets to an IRA that is subject to our management, we will charge an asset-based fee as described above under Item 5 below. This poses a conflict of interest because we have an incentive to recommend a rollover for the purpose of generating compensation rather than solely based on the client's needs. As a fiduciary, we are required to always act in the client's best interests. Clients are under no obligation, contractually or otherwise, to rollover their retirement assets, or to have their assets rolled into an IRA managed by us.

It is important for clients to understand that many employer retirement plan sponsors permit former employees to keep their retirement assets in their company plan, even after the employee terminates their employment with the company or retires. In determining whether to rollover employment retirement plan assets to an IRA or other investments vehicle, clients should consider the costs and benefits of each option. Employees will typically have the following options:

- Leave the funds in the employer's (or former employer's) plan.
- Move the funds to the new employer's retirement plan.
- Withdraw the funds from the plan, which results in a taxable distribution and a taxable event.
- Rollover the funds into an IRA rollover account.

Before making any changes to their plan, we encourage clients to carefully consider any tax implications with their accountant or tax advisor. Below are some general 401K Plan features and differences versus an IRA that clients should take into account:

- Although employer retirement plans may have a more limited investment menu than the investment options available in an IRA, the plan may also have unique investment options not available to the public, such as the opportunity to invest in the employer's securities if the employer is a publicly traded company.
- The employer retirement plan may offer financial advice, guidance, and/or model management or portfolio options at no additional cost, or at a fee which may be lower than our advisory fee.
- Clients should understand the various investments available in an IRA and the costs.
- In some cases, the employer retirement plan may allow participants to hire us as manager and keep the assets titled in the plan's name.
- Clients interested in investing only in mutual funds should understand the cost structure of the share classes available in the employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
- It may be possible to take out a loan on 401k Plan assets. This option is not available for IRAs.
- It may be possible to delay taking 401k Plan or retirement account minimum distributions beyond age 72.
- A 401k Plan may offer more liability protection than a rollover IRA. Although IRA assets are generally protected from creditors in bankruptcies, it depends on state law and there can be some exceptions to the general rules.
- IRA distributions are subject to ordinary income tax and may also be subject to a 10% early distribution tax penalty unless they qualify for an exception. There are certain exceptions available based on age, disability, or if the assets are used to pay for higher education expenses or to purchase a home.

It is important that clients understand the differences and options available as well as the cost and tax implications to be able to decide whether an IRA rollover is appropriate.

Assets Under Management

As of December 31, 2023, FD Wealth has assets under management of \$137,745,191, of which \$87,270,237 are discretionary regulatory assets under management and \$50,474,953 are non-discretionary assets. FD Wealth also managed \$54.2 million in assets under advisement consisting of variable insurance products and annuities. For reporting purposes, annuity contracts are shown based on contract values and variable universal life contracts are shown based on surrender values.

Item 5: Fees and Compensation

The annual advisory fee is generally based upon a percentage of the market value of assets placed under our management and will not exceed 1.25%.

Our current in fee schedule for discretionary and non-discretionary portfolios is:

Up to \$10,000,000	1.25%
\$10,000,0001 to \$25,000,000	1.00%
\$25,000,000 and up	0.75%

Fees are charged quarterly in advance and are calculated on an account's asset value as of the last business day of the prior quarter. The market value is based on the custodian or other independent third party's valuation and include cash balances. The fee will be prorated for cash and securities deposited during the billing period.

Clients should also be aware that other clients may have received negotiated discounts, and the same or similar investment services may be available from other investment advisors for a lower or higher fee. The fees paid to FD Wealth may be reduced for employee and family member accounts. For 401Ks billing is handled by the recordkeeper or administrator. Billing is handled differently by each record keeper/administrator, as agreed to by the plan sponsor or fiduciary. Some recordkeepers/administrators bill monthly, while others bill quarterly, or may bill in advance, and may or may not prorate fees. FD Wealth will work with each plan recordkeeper/ administrator to accommodate their process. FD Wealth's fee will be set forth in the Advisory Agreement with the plan and may be adjusted for certain expenses.

The Investment Management Agreement provides us with written authorization to deduct advisory fees from the client's custodian account. The fees will be reflected in the client's custodian account statements. We request that clients carefully review their custodian statements and inform us of any discrepancies.

Typically, third party management fees are included in FD Wealth's fees except in situations in which specialized portfolios are selected, in which case the client will pay a separate management fee to the third-party manager, as set forth in the third-party manager's fee schedule. FD Wealth does not receive any portion of the third-party manager's fee. Any additional fees will be fully disclosed to the client. FD Wealth fees are exclusive and in addition to brokerage commissions, transaction fees, and other employee costs or expenses which shall be incurred directly by the client. Clients will generally incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by fund managers, custodial fees, set up fees, termination fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic funds fees, and other fees and taxes

on brokerage account and securities transactions.

An asset-based fee may cost more than a transaction-based fee, but clients may prefer an asset-based fee if they want continuing advice or for someone to make investment decisions on their behalf. Although FD Wealth believes the charges and fees offered are competitive with other investment advisors, we make no guarantee that the aggregate cost of a particular program will be lower than that which may be available elsewhere.

When appropriate, FD Wealth may recommend the use of margin and/or option transactions. Because these investment strategies involve a certain degree of additional risk, they are only recommended when consistent with the client objectives and risk tolerance. The use of margin also results in interest charges in addition to all other fees and expenses associated with the management of the account. Although account statements for margined accounts may reflect a negative amount, our advisory fee is based on the account's absolute market value. This poses a conflict of interest because FD Wealth benefits by receiving a higher fee based on the account's absolute market value.

In addition to FD Wealth's advisory fee, each mutual fund or ETF in which a client's assets may be invested also charges its own management fees and other expenses the specific fees and expenses are described in the respective fund's prospectus. Depending on the fund, a client may be able to invest directly in the shares issued by a mutual fund with or without incurring any sales charges or advisory fees. Mutual fund companies generally offer multiple share classes of the same fund. Share classes are described in the mutual fund's prospectus. Each share class charges different fees and expenses. Depending on the share class selected, fees and internal expenses charges may be higher or lower. Certain funds do not charge a transaction fee but have higher internal expenses. Selecting funds that charge higher fees and expenses may adversely impact an account's long-term performance. FD Wealth's policy is to generally recommend that clients invest in the lowest cost share class available based on the client's individual situation. FD Wealth usually recommends advisor or institutional share classes that typically have the lowest expense ratios and are more beneficial than other share classes. Advisor or institutional share classes are typically available to investors in qualified fee-based advisor programs, or accounts that meet certain minimum investment requirements.

When deemed appropriate, we may recommend that a client that transfers in mutual fund holdings liquidate their existing holdings, which could result in tax consequences, or the client having to pay contingent deferred sales charges, or other redemption fees. Clients are encouraged to review the fees charged by the funds and our advisory fees to fully understand the total amount of fees to be paid. Please refer to the mutual fund's prospectus for additional information regarding a particular fund's fees and expenses.

Compensation on Insurance Product Sales

One or more FD Wealth Investment Adviser Representatives are also licensed insurance agents and will when deemed appropriate, recommend that FD Wealth clients purchase insurance products. The receipt of commissions poses a conflict of interest because the FD Wealth investment insurance agent has an incentive to recommend that clients purchase insurance products in order to generate commissions.

In addition, as deemed appropriate, FD Wealth will recommend that clients purchase or exchange commission free annuities to be managed by FD Wealth. This poses a conflict of interest because FD Wealth benefit from increased assets under management and a higher management fee.

Clients are under no obligation to purchase insurance or securities products from FD Wealth or any

particular individual, brokerage firm, insurance company, or service provider and may purchase such products through a different insurance agent or provider. We manage these conflicts through disclosure, so that clients can make an informed decision and through policies and procedures that require us to act in the client's best interests.

Termination

The advisory relationship with FD Wealth can be terminated at any time, by either party, for any reason upon 30 days written notice, as set forth in our Investment Management Agreement. Fees for accounts terminated during a calendar quarter will be refunded on a prorated basis.

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

FD Wealth does not charge performance-based fees or participate in side-by-side management.

Item 7: Types of Clients

FD Wealth offers advisory services to individuals, high net worth individuals, trusts, estates, corporations, limited liability companies and retirement plan sponsors.

We typically require a minimum account size of \$250,000, additionally the third-party manager(s) we recommend may have minimum account requirements. FD Wealth's advisors will discuss the specific requirements with clients. At our sole discretion, we may waive or lower the required account minimum.

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

FD Wealth designs investment advice based on the clients' investment objectives and goals. In formulating investment advice and our outlook on the market, we rely on various sources of information, including but not limited to third-party research materials, company press releases, annual reports, prospectuses, SEC filings and credit ratings.

Methods of Analysis

We will, as deemed appropriate, use the following methods of analysis:

- Fundamental Analysis - The review of a company's financial statements, industry, market trends and other factors to develop an assessment of the company's potential for future earnings growth.
- Technical Analysis - The statistical analysis of price and volume patterns to predict a security's future price movements or trends.

There can be no assurances that fundamental or technical analysis will be accurate or achieve the intended goals.

Investment Strategies Used

We will generally use the following strategies in managing client accounts:

- Asset Allocation - The process of dividing an investment portfolio among different asset classes, such as stocks, bonds and cash, or cash equivalents in an effort to reduce or manage risk.

- Diversification - The process of dividing investments within asset categories in an effort to reduce or manage risk.
- Rebalancing - The process of periodically rebalancing an investment portfolio back to the previously set asset allocation targets in an effort to maintain the predetermined investment allocation mix.

Although FD Wealth will seek to implement strategies to minimize potential losses, there can be no assurance that these strategies will be successful, particularly in the short term and clients may lose all or a substantial portion of their assets.

Risk of Loss

Investing involves risk of loss that clients should be prepared to bear. Below is a general discussion of different types of risks facing investors:

Market Risk - The stock market as a whole, or the value of an individual company's security, will fluctuate in value and cause the value of a client's investments to increase or decrease. Market risk exists in all types of investments.

Fixed Income Market Risk - The market price of debt securities will typically decrease or increase as interest rates rise or fall, which will cause the value of a client's investments to increase or decrease. When investing in fixed income securities, there is the risk that the issuer will default on the bond and be unable to make payments. Securities that are rated by the credit rating agencies as below investment grade, also known as "high yield bonds" or "junk bonds" involve a greater risk of default and loss of principal. Fixed income investors that receive regular interest payments face the risk that inflation will erode their spending power.

Credit/Counterparty Risk - The risk that the issuer or guarantor of a fixed income security, or the counterparty of a structured product or derivative contract will default on its obligation to pay interest and/or principal, resulting in a loss to the investor.

Liquidity Risk - The risk that if a particular security or instrument becomes illiquid, an investor may not be able to sell the position for an acceptable price or may not be able to sell it at all, resulting in a loss to the investor.

Leverage - Leverage creates an opportunity for greater total returns, but also carries a greater risk of loss from adverse price changes and margin calls.

Foreign Securities/Emerging Markets Risk - Foreign securities may involve additional risks due to political, economic, regulatory, and operational uncertainties and/or currency fluctuations. Clients should be aware that all these risks may be heightened in emerging markets.

Risk of Specific Types of Investments

Different financial instruments have different levels of exposure to risk and may therefore be inappropriate for a particular client's circumstances or risk tolerance. Additional product and risk disclosures are included in the prospectus, offering documents or term sheets for the particular investment, or provided when investments are made.

Brokered Certificates of Deposit - Brokered CDs may have higher minimum investments and longer maturities than traditional bank CDs. Unlike traditional bank CDs, periodic interest payments on Brokered CDs are not reinvested. Investors wishing to sell their Brokered CDs in the secondary market prior to maturity should be aware that liquidity in the secondary market can be limited, their CD will be subject to market risk and the price will fluctuate prior to maturity and may be less than

the face value of the CD. Additionally, the price of the CD will include accrued interest up to the settlement date. Although FD Wealth does not charge commissions on CD transactions, secondary market CDs will include a markup. FD Wealth does not guarantee in any way the financial condition of the issuing bank. Brokered CDs are eligible for FDIC insurance up to \$250,000 (including principal and interest) per account (individual, joint, IRA, etc.) and per issuing bank.

Callable CDs give the issuing bank the option to terminate or call the CD prior to maturity. Investors in Callable CDs should be aware that in a lower interest rate environment, their CD will likely be called prior to maturity and the principal reinvested at a lower interest rate. Callable CDs tend to have longer maturities than traditional bank CDs and are subject to market risk. The market price of Callable CDs will fluctuate prior to maturity and therefore investors should be prepared to hold their CDs until the maturity date or until they are called.

Mutual Funds and ETFs - The risk of owning a mutual fund or ETF generally reflects the risks of owning the underlying securities the mutual fund holds. Mutual fund and ETF investors should carefully review the respective mutual fund or ETF's prospectus which contain a description of the investment objectives, risks, fees, and expenses.

Annuities - Variable annuities are complex financial products offered by insurance companies and are regulated by state insurance departments as well as the SEC. Variable annuities are a type of annuity contract. A variable annuity is different from a fixed annuity in that it generally does not guarantee an interest yield from investments. The variable annuity's value is based on the performance of underlying investment portfolio of sub accounts. Variable annuities are designed for long-term investing and are subject to market risk, including loss of principal.

Fixed annuities are primarily regulated by state insurance departments and not the SEC. Fixed index annuities are a type of annuity contract that pays an interest rate based on the performance of a specified market index, such as the S&P 500. While the interest rate credited to an indexed account is linked to the performance of an underlying index, premium payments made to a fixed index annuity are not directly invested in the stock market. However, certain provisions in these contracts can limit the potential upside to only a portion of the market's rise. There are risks, fees and charges associated with fixed index annuities.

Prior to purchasing an annuity, clients should carefully review the prospectus, contract or other offering documents from the insurance company that offers the annuity. These documents contain important information about the annuity's features, benefits, risks, fees surrender charges, surrender periods and other costs and expenses associated with the annuity, including surrender charges.

Alternative Investments - Investments in private funds such as hedge funds, or private equity involve long holding periods, have little liquidity and carry a significant degree of risk. These types of investments should only be assumed by sophisticated investors capable of bearing the risk of loss of all their investment. Before investing, prospective investors should carefully review the offering documents which contains a description of the risks, fees, and expenses.

FD Wealth seeks to mitigate the above risks by monitoring: markets, economic conditions, industries, and changes to the general outlook on corporate earnings, regulatory developments, monetary policies by central banks, changes to interest or currency rates or adverse investor sentiment. However, there can be no assurances that a particular strategy will be successful or be able to avoid a loss. Investment performance of any kind is not guaranteed, and past performance is not an indication of future results.

Other Risks

Cybersecurity Risk - FD Wealth utilizes electronic communication networks and electronic media to maintain information regarding its clients and its business. This creates an inherent risk for cyber security incidents or cyber-attacks that may result in the inadvertent disclosure of confidential sensitive information to unintended parties, unauthorized access to confidential sensitive information, or operational disruptions by malicious hackers. We maintain technical and physical safeguards and take other reasonable precautions to safeguard the confidentiality of sensitive information and internal data including periodic testing of our systems. However, even with the implementation of reasonable precautions, the risk remains that cybersecurity incidents may occur. FD Wealth has in place policies and procedures regarding information technology security. In the event of such an incident, we will promptly notify the affected parties and take all necessary and appropriate actions,

Item 9: Disciplinary Information

We are required to disclose legal or disciplinary events involving the firm or its employees that are material to the client's evaluation of FD Wealth business or the integrity of its management. FD Wealth and its employees have not been the subject of any disciplinary proceedings and at this time, FD Wealth has no information to report that is applicable to this item.

Item 10: Other Financial Industry Activities and Affiliations

FD Wealth does not have an application pending to register with the SEC as a broker-dealer. FD Wealth does not have any control affiliates or related persons that are broker-dealers, investment advisers or investment companies. Additionally, FD Wealth is not registered, and does not have an application pending to register as a Futures Commission Merchant (FCM), Commodity Pool Operator (CPO), a Commodity Trading Advisor, (CTA).

Our relationship with our affiliate Financial Designs Inc. doing business as FD National, an independent insurance agency is material to our business. We have an agreement with FD National to provide certain administrative services. In addition, FD National will from time to time refer clients to us. We receive economic benefits from this arrangement.

As noted, one or more FD Wealth financial advisors are licensed insurance agents, and one FD Wealth financial advisor is also a registered representative of an unaffiliated broker-dealer. In this capacity, he receives commission-based compensation on insurance and brokerage business. This is separate from FD Wealth's advisory business and fees and poses a conflict of interest because he has an incentive to recommend brokerage and insurance products in order to receive commissions.

Clients are under no obligation to purchase insurance or securities products from a particular individual, brokerage firm, insurance company, or service provider. We manage these conflicts through disclosure, so that clients can make an informed decision and through policies and procedures which require us to act in the client's best interests.

Dynamic Advisor Solutions, LLC ("Dynamic")

FD Wealth has entered into a sub advisory and service agreement with Dynamic, an unaffiliated SEC registered investment advisor. The agreement with Dynamic is material to its business. The arrangement provides FD Wealth with access to customized portfolios, and access to its custodian and clearing platforms, research, marketing, and administrative support. FD Wealth believes that this arrangement is beneficial to its business and its clients. Pursuant to this agreement, a portion

of the total fee paid to FD Wealth for advisory services is allocated to Dynamic for investment management, administrative and operational support services. FDWealth may be incentivized to recommend Dynamic in order to receive economic benefits. We manage this potential conflict through disclosure, so that clients can make an informed decision and through policies and procedures which require us to act in the client's best interests.

As part of FD Wealth's compliance program, the Firm will periodically assess external relationships and as applicable, will take steps to address any identified conflicts.

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

FD Wealth has adopted a Code of Ethics in compliance with Rule 204A-1 under the Investment Advisers Act of 1940 ("Advisers Act") that describes FD Wealth's fiduciary duty to its clients and the high standard of conduct expected of its employees. The Code of Ethics includes provisions relating to:

- a prohibition on engaging in any fraudulent, deceptive, or manipulative practice, including insider trading;
- procedures for maintaining the confidentiality of client information;
- reporting of certain gifts and business entertainment;
- personal trading policies that require putting client's interests first;
- preclearance of employee's participation in certain investments such as initial public offerings, or private offerings; and
- reporting of personal securities holdings and transactions.

FD Wealth may purchase, sell, or recommend to clients, securities in which the Firm, its officers, directors, and employees maintain a position, or have a financial, or other interest. FD Wealth has a fiduciary duty to act in the best interests of its clients and when an apparent or potential conflict exists, the interests of clients must be placed above the interests of the Firm, its officers, and employees.

All employees must acknowledge and agree to abide by the terms of FD Wealth's Code of Ethics and report any violations of the Code of Ethics to the Chief Compliance Officer. Failure to abide by the Code of Ethics will subject an employee to sanctions which may include termination of employment. Clients may request a copy of our Code of Ethics by contacting us at info@fdwealth.net.

Item 12: Brokerage Practices

FD Wealth does not have discretionary authority to select the client's custodian. Clients will select the custodian to safeguard client assets and authorize us to execute trades through the custodian's brokers, or other brokers selected by us.

Best Execution

FD Wealth has an obligation to seek "best execution" for client transactions. The SEC defines best execution as the "best qualitative execution" not necessarily the lowest possible execution cost. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the executing broker's services, including the institution's financial strength, reputation, soundness, execution capability, commission rates, and responsiveness. FD Wealth will generally not negotiate commissions on behalf of its clients on a trade-by-trade basis if not using a subadvisor. Typically, the

executing broker or custodian will determine those costs. Although executing brokers are subject to best execution obligations and will generally seek competitive commission rates, they are not obligated to choose the broker offering the lowest available commission rate if, in their reasonable judgment, a higher commission may be justified by the services provided by the broker, or by other factors such as those described above. As part of its fiduciary duty, FD Wealth will periodically evaluate the quality of brokerage services received and the quality and cost of services available from alternative brokers or venues.

Soft Dollars and Referral Arrangements

We do not receive client referrals from external brokers, or financial intermediaries in exchange for directing client brokerage to financial intermediaries or brokers. Although FD Wealth has not entered into third party soft-dollar arrangements with any external brokers, the Firm's receipt of research from the client's custodians, brokers, or financial intermediaries may be deemed to be soft dollars. To the extent FD Wealth receives research, it will be used to benefit all clients.

Trade Aggregation

If no subadvisor is being used and when practical and appropriate, we may aggregate multiple client orders into one trade. In an aggregated trade, all participants will receive an average price. If a partial execution is obtained, FD Wealth will generally allocate shares on a pro rata basis, or in a manner that is equitable to the clients involved.

Allocation of Investment Opportunities

From time to time, two or more accounts may seek to invest in the same securities or pursue a similar strategy. In such cases, FD Wealth will ensure that one account or group of accounts is not favored or preferred over another account or group of accounts. As a fiduciary, FD Wealth must at all times act in the best interest of all its clients.

Directed Brokerage

If a client asks us to direct transaction(s) to a specific broker or brokers for execution, we may be unable to achieve the most favorable execution. This can result in additional costs for the client.

Principal and Cross Trades

FD Wealth does not engage in principal trades, or effect cross transactions for client accounts.

Trade Errors

FD Wealth's trade error policy is to restore the client's account to the original position through a trade correction, trade cancellation, or adjustment so that clients are not adversely impacted.

Item 13: Review of Accounts

FD Wealth monitors client accounts on an ongoing basis for consistency of portfolio investments with objectives and risk tolerance, performance, allocations, and compliance with any reasonable investment restrictions. FD Wealth confirms the client's investment objectives and selected investment profile at least annually. Clients are reminded to promptly notify us if there are material changes to their financial situation or investment objectives, as this will affect the management of their account.

Item 14: Client Referrals and Other Compensation

FD Wealth does not currently have any solicitor/referral arrangements to compensate, either directly or indirectly, unaffiliated individuals or entities, for client introductions or referrals, although FD Wealth may enter into such arrangements at any time, consistent with applicable regulatory guidance and the provisions in Advisers Act Rule 206(4)-1.

The Rule's requirements include among other things, providing certain disclosures to clients including a copy of FD Wealth's most recent Form ADV Part 2A Brochure and a disclosure document that sets forth compensation paid to the solicitor/referral agent. The fee payable to solicitors/referral agents may not result in any additional charge to clients introduced by the solicitor/referral agent. FD Wealth may not charge clients more as a result of these types of solicitor/referral arrangements.

From time to time, FD Wealth receives client referrals from its affiliate FD National, or may refer clients to FD National. Although no direct compensation is paid or received for the referral, each affiliate benefits from additional business generated by the referral. Clients are not obligated to use the services of FD National and may select a different benefits or insurance provider.

Item 15: Custody

FD Wealth's limited ability to instruct the client's custodian to deduct advisory fees from its client's accounts results in FD Wealth being deemed to exercise "custody" over client assets. We do not to accept physical custody of client's funds or securities or engage in activities that would cause the firm to be subject to the provisions in Advisers Act Rule 206(4)-2 (the Custody Rule). Client's cash and securities are maintained at banks, broker-dealers or other financial institutions that serve as the client's custodian.

We are also deemed to have custody of clients' assets in situations where we have discretion related to third-party transfers contained in Standing Letters of Authorization. The SEC has issued a no-action letter providing relief from certain Custody Rule requirements if we comply with safeguards outlined in the letter. It is our intention to comply with such safeguards.

The client's custodian(s) are required to send account statements directly to clients at least quarterly. The custodian(s) also offer clients online access to their accounts. The custodian account statements will show all account activity and transactions during the period, including beginning and ending balances, current values and holdings and the amounts deducted from the client's account for payment of our advisory fees. FD Wealth encourages clients to carefully review the custodian account statements and promptly notify us of any discrepancies or errors.

Item 16: Investment Discretion

For discretionary accounts, the Investment Management Agreement provides FD Wealth with limited authority to determine, without obtaining the client's specific client consent, the third-party manager to be used, securities to be bought or sold, the amount of the securities to be bought or sold, and the broker to be used to execute transactions. Clients may limit our discretionary authority by imposing reasonable investment restrictions limiting the types of securities that can be purchased for their account. FD Wealth will exercise this discretionary authority in a manner consistent with each client's stated investment objectives.

For non-discretionary accounts, we provide investment advice, formulate strategies, and evaluate account performance, but are required to obtain the client's approval prior to placing any transactions. Consequently, if we are unable to reach the client to obtain the client's consent to execute a particular recommendation or strategy, the investment opportunity may no longer be available at the desired price.

Item 17: Voting Client Securities

FD Wealth does not have authority to and does not vote proxies on behalf of advisory clients. Clients are responsible for voting proxies for all securities held in their portfolios. The client's custodian will mail all correspondence related to proxies, class action lawsuits, legal proceedings, bankruptcies, and proceedings involving issuer whose securities are held in the client's account directly to each client. Any required action is the responsibility of the client. FD Wealth may provide general information and answer general client questions regarding the voting of proxies to the extent that the Firm has relevant knowledge or information. Please contact us at info@fdwealth.net to obtain a copy of our Proxy Voting Policy.

Item 18: Financial Information

We are required to provide clients with certain financial information or disclosures about the advisor's financial condition. As of the date of this Brochure, FD Wealth has no financial commitments or liabilities that could impair our ability to manage client accounts and meet our contractual commitments to clients. FD Wealth and its management have not been the subject of any bankruptcy or other proceeding that might impact its financial condition.