

## **Strategic Wealth Management Group, LLC**

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**March 5, 2012**

### **FORM ADV PART 2A. BROCHURE**

**This brochure provides information about the qualifications and business practices of Strategic Wealth Management Group, LLC. If you have any questions about the contents of this brochure, please contact us at 410-988-9494. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about Strategic Wealth Management Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Strategic Wealth Management Group, LLC is 113678.**

**Strategic Wealth Management Group, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

## **ITEM 2 - MATERIAL CHANGES**

MATERIAL CHANGES TO THE FORM ADV PART 2 BROCHURE LAST ANNUAL UPDATE WAS 11/1/2010

Changed Asset Under Management to 2011 amounts:

E. Assets Under Management

Per Part 1A ADV Page 8 Assets Under Management F(2) as of 12/31/11:

Discretionary: \$493,250,457.31

Non-Discretionary: \$176,372,682.62

Deleted notation of relationship:

Client Referrals and other Compensation:

Strategic Wealth Management Group, LLC also employs Norman E. Sturm, Jr. under which part of his compensation is based on new business referred to Strategic Wealth Management Group, LLC

Strategic Wealth Management Group, LLC maintains a relationship with Suckstorf Financial Consulting, LLC. Suckstorf Financial Consulting serves as an external solicitor. Suckstorf Financial Consulting will receive twenty five percent (25%) of the compensation received from referral activity.

Changed wording from John Farrell & Associates to John R. Farrell:

Strategic Wealth Management Group, LLC maintains a relationship with John R. Farrell. John R. Farrell serves as an external solicitor. John R. Farrell will receive twenty five percent (25%) of the compensation received from referral activity.

Form ADV Part 2B Supplement:

Removed Education Background and Business Experience:

Norman Sturm, Jr.

Jan Matschullat-Gratz

Added Education Background and Business Experience:

**James W. Battle, IV, CFP®**

D.O.B. 1986

Formal Education:

McDaniel College, Westminster, MD

Bachelor of Arts Business Administration & Economics – Graduated 2008

CFP – conferred by Certified Financial Planner Board of Standards 2/2012

Business Background:

Strategic Wealth Management Group, LLC – Account Rep & Investment Committee Member – 6//08 – Present

Talbot Bank – Bank Teller – 6/2007-8/2007

Student – 2004-2008

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## ***Advisory Business***

Form ADV Part 2A, Item 4

A. Strategic Wealth Management Group, LLC provides investment supervisory services, financial planning (analysis and reports), and consultation for individuals and businesses. The firm started in February 14, 2001. The principal owners are James Griesser, Shaun Eddy, James Eichelberger, and Gary Desjardins.

B. Investment supervisory services are based on the needs of the individual client. These services are considered continuous in nature and as such, investment accounts are reviewed on an ongoing basis. Financial planning services may be offered on a full-service or limited-service basis. Full service financial planning will include a complete analysis of the clients' investments, retirement goals, accumulation goals, income taxes, insurance review, business needs, and a summary of needs for estate planning. Limited service Financial Planning will provide planning services for individual goals such as education, retirement, insurance reviews or other individual needs of the client. Financial Planning services may include advice concerning investments that are not under the supervision of Strategic Wealth Management Group, LLC's Financial planning recommendations may be implemented through Strategic Wealth Management Group, LLC or through any vendor of the client's choosing. Strategic Wealth Management Group, LLC will recommend services and products most suitable for the client, regardless of Strategic Wealth Management Group, LLC, access to provide these services or products. Strategic Wealth Management Group, LLC provides fiduciary and risk management assistance to our clients with regard to their company's qualified retirement/401k plan. With respect to the servicing of qualified retirement plans, Strategic Wealth Management Group, LLC utilizes the services of a third party administration firm.

C. Investment accounts are managed on a non-discretionary or discretionary basis depending on client needs. In that Strategic Wealth Management Group, LLC may have discretionary authority, it is possible that the firm may determine without obtaining specific client consent the securities to be bought or sold and or the amount of the securities to be bought or sold. In some instances discretionary authority is implied per authorization included in the custodians account application. Strategic Wealth Management Group, LLC will only use discretionary authority when that client has signed a discretionary management agreement. All other clients will approve activity in their accounts before it occurs. Strategic Wealth Management Group, LLC will typically recommend the use of an investment institution to serve as custodian for clients' assets. The client shall have total freedom to execute securities and/or insurance transactions with any company of their choice. Strategic Wealth Management Group, LLC will typically recommend the use of Charles Schwab as custodian for client accounts. Strategic Wealth Management Group, LLC will typically utilize a custodian who is a discount broker so as to minimize transactional fees to its clients. Strategic Wealth Management Group, LLC will endeavor to ensure that the custodial fees or commissions charged by custodians or other institutions with which it has a relationship are reasonable and competitive, but does not use fees as the sole determinant to use or not use a specific institution. Other considerations such as ease of communication and the quality of customer service may also be considered in selecting custodians for client investments. Strategic Wealth Management Group, LLC will at no time make decisions to use or not use the services of a custodian solely based on benefits that Strategic Wealth Management Group, LLC may potentially receive. Strategic Wealth Management Group, LLC will hold its fiduciary responsibility to its clients as the main factor in all decisions to use or not use a custodian. Strategic Wealth Management Group, LLC will not change or alter its fees structure to reflect differences in services of individual custodians or institutions. The client is under no obligation to use any of these institutions and may choose any investment institution qualified to serve as custodian for their assets.

D. If you participate in *wrap fee programs* by providing portfolio management services, (1) describe the differences, if any, between how you manage wrap fee accounts and how you manage other accounts, and (2) explain that you receive a portion of the wrap fee for your services.

NOT APPLICABLE

E. Assets Under Management

Per Part 1A ADV Page 8 Assets Under Management F(2) as of 12/31/11:

Discretionary: \$493,250,457.31

Non-Discretionary: \$176,372,682.62

## ***Fees and Compensation***

Form ADV Part 2A, Item 5

A. Investment supervisory fees are based on a maximum annual fee of 1.5% of assets under management and are negotiable. Strategic Wealth Management Group, LLC may also bill using an agreed upon flat fee or tier schedule for services provided. This flat fee would be divided quarterly at 25% of the total annual fee. This flat fee may if agreed by client include financial planning and investment management services combined or may be only for investment management service. All investment management fees and financial planning fees are negotiable.

B. Investment management fees are billed on a quarterly basis and are based on the closing balance of the managed portfolio at the end of the most recent closing quarter. Investment management fees are billed forward for the period of one quarter. This fee is determined by dividing the annual fee by four and then charging this resulting fee against the closing balance for the most recent quarter. These fees will be debited from each account respectively. In the event that there is insufficient cash in a specific account (either a qualified account or a non-qualified account) to adequately cover the advisory fee owed by such specific account, then advisory fees will be debited by Strategic Wealth Management Group, LLC from a non-qualified account. Advisory fees owed to Strategic Wealth Management Group, LLC by a qualified account may be debited from that specific account or a non-qualified account. If no cash is available for fees, securities will be liquidated to cash in the account(s) to provide for the fees. If the client does not wish the fees to be debited from their account, we will mail the invoice with the client's quarterly report.

Financial planning fees will typically range from \$3,000 to \$10,000 for financial planning services.

Fees will be based on the complexity of the analysis and time required to complete such analysis.

Strategic Wealth Management Group, LLC may charge a \$1,500 retainer which will be due at the time

the agreement is initiated. The fee for financial planning will be due at the time of plan delivery.

Where appropriate, Strategic Wealth Management Group, LLC will also work at an hourly rate up to \$300.

C. Commissionable insurance products may be purchased through associated persons of Strategic Wealth Management Group, LLC in their separate capacities as insurance agents or brokers. Advisory fees charged by Strategic Wealth Management Group, LLC are separate and distinct from management fees and other expenses charged by mutual funds or other investments which may be recommended to advisory clients. These fees are described in the individual funds prospectuses or the investment broker's commission schedule.

D. If the client terminates the advisory relationship at any time the unused balance of fees will be refunded to the client. This refund is determined by dividing the total quarterly fee by the number of days in the quarter and then by multiplying this result times the number of unused days left in the quarterly billing cycle. The unused amount will then be promptly refunded to the client. The investment adviser will not be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of the client.

A client may terminate the financial planning agreement and receive a 100% refund of any fee paid, including any retainer or other prepaid fees, by calling the financial planner at any time throughout the planning process or before the end of the tenth business day following delivery of the written financial plan, at our Columbia, Maryland office (410) 988-9494. If an agreement is terminated, the client agrees to return all materials and reports provided by Strategic Wealth Management Group, LLC prior to issuance of refund.

E. If you or any of your *supervised persons* accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds, disclose this fact and respond to Items 5.E.1, 5.E.2, 5.E.3 and 5.E.4.

NOT APPLICABLE

***Performance-Based Fees and Side-By-Side Management***

NOT APPLICABLE

Form ADV Part 2A, Item 6

### ***Types of Clients***

Form ADV Part 2A, Item 7

In accordance with Part IA of ADV page 7 Clients D –

- 1) Individuals (other than high net worth individuals)\*
- 2) High net worth individuals
- 3) Pension and profit sharing plans (other than plan participants)
- 4) Charitable Organizations
- 5) Corporations

\*The category “individuals” includes trusts, estate, 401(k) plans and IRAs of individuals and their family members.

### ***Methods of Analysis, Investment Strategies and Risk of Loss***

Form ADV Part 2A, Item 8

A. SWMG's investment committee utilizes research which includes contact directly with investment and/or fund family, various methods of independent research (Morningstar, fi360 and information provided by various custodians). SWMG works with all clients to better understand their risk tolerance and to develop an Investment Policy Statement. SWMG educates all clients on the risks associated with different types of investments and asset classes.

B. SWMG generally allocates portfolios across a broad range of asset classes. Types of investments generally include cash, a broad range of bonds, and bond and equity mutual funds. SWMG does not practice in any specific trading strategies that would create higher than normal volatility as it relates to the market. SWMG's primary strategy does not involve frequent or excess trading.

C. SWMG does not recommend a particular type of security. Generally, we recommend a broad range of investments as mentioned in item B above. All investments are selected and monitored for suitability for each individual client. In any event that an investment or strategy becomes riskier than planned, all risks such as potential loss of principal, poor returns, lack of liquidity and/or ongoing volatility are carefully reviewed and discussed with each client.

***Disciplinary Information***

Form ADV Part 2A, Item 9

NOT APPLICABLE

### ***Other Financial Industry Activities and Affiliations***

Form ADV Part 2A, Item 10

- A. If you or any of your *management persons* are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer, disclose this fact.

NOT APPLICABLE

- B. If you or any of your *management persons* are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities, disclose this fact.

NOT APPLICABLE

- C. & D. Strategic Wealth Management Group, LLC has entered into an agreement with Charles Schwab & Company, Inc. an independent and unaffiliated Custodian ("Schwab") to participate in the Separate Account Manager Program (SAM) and Managed Account Select (MAS). These Programs will provide client access to private third-party money managers. The total fee charged to the advisory client shall be a maximum of 2.70 percent of the assets under management computed on an annual basis plus trading commission paid to Charles Schwab at the time of the trades. This fee is a maximum fee and shall be negotiable to a lower amount based on the individual facts and circumstances of the specific

case. Of the total 2.70 percent management fee, Strategic Wealth Management Group, LLC shall receive a maximum of 1.5 percent and Charles Schwab & Company, as custodian, shall receive either the trading commissions through transaction based pricing or asset-based pricing for executing the trades directed by the third party money managers. Strategic Wealth Management Group, LLC fees shall be paid on a quarterly basis.

Strategic Wealth Management Group, LLC has a material relationship with The Standard. The Standard is a registered investment adviser as well as a Third Party Administration firm. Strategic Wealth Management Group, LLC may recommend that a specific advisory client utilize the services of The Standard. Strategic Wealth Management Group, LLC will select and monitor, on a continuous basis, the specific investment made within the portfolios of the various qualified plans. Strategic Wealth Management Group, LLC will address the issue of employer meetings and The Standard will assist in this process to the extent applicable to the professional services being provided by them. The Standard will provide the framework and back office support in order to permit employee accounts to receive a daily valuation, which will be internet accessible. Depending on the custodian relationship that is agreed upon by the client, Strategic Wealth Management Group, LLC may bill either by debiting advisory fees directly from the client's account or by forwarding an invoice directly to the client.

Applicant has entered into an arrangement with Carderock Capital (The Mersereau Company). Carderock Capital, a third-party money management consultant. Carderock Capital, will use the custodial services of Charles Schwab and Co. The total fee charged to the advisory client shall be a maximum of 2.70 percent of the assets under management computed on an annual basis. This fee is a maximum fee and shall be negotiable to a lower amount based on the individual facts and circumstances of the specific case. Of the total 2.70 percent management fee, applicant shall receive a

maximum of 1.5 percent and Charles Schwab & Company, as custodian, shall receive the trading commissions for executing the trades directed by Carderock Capital. Carderock Capital will receive a maximum fee of .80 for their investment management. These fees shall be paid on a quarterly basis.

Applicant has entered into an arrangement with Standish Mellon Asset Management. Standish Mellon Asset Management, a third-party money management consultant. Standish Mellon Asset Management will use the custodial services of Charles Schwab and Co. The total fee charged to the advisory client shall be a maximum of 2.70 percent of the assets under management computed on an annual basis. This fee is a maximum fee and shall be negotiable to a lower amount based on the individual facts and circumstances of the specific case. Of the total 2.70 percent management fee, applicant shall receive a maximum of 1.5 percent and Charles Schwab & Company, as custodian, shall receive the trading commissions for executing the trades directed by Standish Mellon Asset Management. Standish Mellon Asset Management will receive a maximum fee of .30% for their investment management. These fees shall be paid on a quarterly basis.

Applicant has entered into an arrangement with TIAA/CREF as a firm/advisor that allows Strategic Wealth Management Group, LLC clients to access TIAA/CREF products and services. An account in the client's name is opened at TIAA/CREF for each account. The money to fund the annuity (the initial premium) will be transferred to these accounts (either by wire or check form) for custody at TIAA/CREF. Strategic Wealth Management Group will charge an asset management fee on assets based on the agreed upon fee indicated in the client's Strategic Wealth Management Group, LLC asset management contract. The maximum fee charged will be 1.5% of the value of the account. Fees will not be taken directly from the client's account at TIAA/CREF. Either the client will write Strategic Wealth Management Group, LLC a check for these fees or Strategic Wealth Management Group, LLC will pull these fees (with the client's written permission) from the client's account at Charles Schwab &

Co., which is currently being managed by Strategic Wealth Management Group, LLC.

Advisors Asset Management is an institutional bond firm that we use as one source to buy fixed income securities. Here is the process: We select the fixed income security we want to buy from AAM's inventory. We provide AAM with the client's name, social security or tax identification number, the client's account number at Charles Schwab & Co and settlement instructions (either DTC, Federal Book Entry or Physical delivery Instructions – typically DTC instructions will be given). AAM uses this client information to open a delivery vs. payment (DVP) account at the contra broker's, which is the clearing house for the trades. AAM uses the Pershing as the clearing house for all trades. A tradeaway trade notification worksheet is completed and faxed to Charles Schwab to affirm transaction. The fixed income assets are transferred to the client's Charles Schwab account from the contra broker after settlement. Charles Schwab charges a \$25 ticket charge for each trade. AAM does not charge a fee.

Morgan Stanley is an institutional firm that we use as a source to purchase fixed income securities. Here is the process: We select from Morgan Stanley's inventory what asset we would like to purchase for the client. We provide Morgan Stanley with the client's name, Social Security or Tax ID number, client's account number at Charles Schwab & Co., and settlement instructions (DTC, Federal Book Entry, or Physical delivery instructions – typically we would use DTC instructions). Morgan Stanley uses this client's information to open a delivery vs. payment (DVP) account at the contra brokers which is a clearing house for the trades. A tradeaway ticket notification worksheet is completed and faxed to Charles Schwab & Co. to affirm the transaction. The fixed income assets are transferred to the client's account at Charles Schwab & Co on the date of settlement listed on the tradeaway ticket. Charles Schwab charges the client a \$25.00 trade fee for each trade. Morgan Stanley does not charge a fee.

Strategic Wealth Management Group, LLC's associated persons in their individual capacities may be licensed to transact business with various insurance carriers. Associated persons may receive separate, customary commission compensation from the respective insurance carrier where business is placed. Clients are under no obligation to purchase any insurance products through Strategic Wealth Management Group, LLC or its associated persons.

Strategic Wealth Management Group, LLC has relationships with various insurance companies as well as individual companies that specialize in matters concerning qualified retirement plans. These companies include, but are not limited to, The Standard, ING, John Hancock, Principal Financial, Lincoln Financial, and TransAmerica. The fees paid for the servicing of these retirement plans are typically a percentage of assets under management.

### ***Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***

Form ADV Part 2A, Item 11

Strategic Wealth Management Group, LLC has adopted a written Code of Ethics in compliance with SEC rule 204A-1. The code sets forth standards of conduct and requires compliance with federal securities laws. Our code also addresses personal trading and requires our personnel to report their personal securities holdings and transactions to the Chief Compliance Officer of the firm. Strategic Wealth Management Group, LLC will provide a copy of our Code of Ethics to any client or prospective client upon request.

Strategic Wealth Management Group, LLC or individuals associated with Strategic Wealth Management Group, LLC may buy or sell securities identical to those recommended to clients for their personal accounts. It is the expressed policy of Strategic Wealth Management Group, LLC that no person employed by Strategic Wealth Management Group, LLC may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts. Strategic Wealth Management Group, LLC or any related person(s) may have an interest or position in a certain security (ies) which may also be recommended to a client. 1) A Director, officer or employee of Strategic Wealth Management Group, LLC shall not buy or sell securities for their personal portfolio (s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on a reasonable inquiry. No person of Strategic Wealth Management Group, LLC shall prefer his or her own interest to that of the advisory client. Strategic Wealth Management Group, LLC maintains a list of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer/individual of Strategic Wealth Management Group, LLC.

### **Brokerage Practices**

Form ADV Part 2A, Item 12

SWMG, LLC, participates in Charles Schwab & Co.'s, Schwab Institutional (SI) service program.

While there is no direct linkage between the investment advice given and participation in the SI program, economic benefits are received which would not be received if SWMG, LLC did not give investment advice to clients. These benefits include: receipt of duplicate confirmations and bundled duplicate statements; access to a trading desk serving SI participants exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client's account; ability to have investment advisory fees deducted directly from client accounts; access to an electronic communication network for client order entry and account information; receipt of compliance publications; and access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investments.

Schwab Institutional also makes available to SWMG, LLC other services intended to help SWMG, LLC manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition Schwab may make available, arrange and or pay for these types of services rendered to SWMG, LLC by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to SWMG, LLC. While as a fiduciary, SWMG, LLC endeavors to act in its clients' best interests, SWMG, LLC's recommendation/requirement that clients maintain their assets in accounts at Schwab may be based in

part on the benefit to SWMG, LLC of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

SWMG does not participate in any broker related referral programs. On the occasion that SWMG refers a client to use a specific custodian, Charles Schwab is often mentioned as an option for a discount brokerage firm that offers convenient technology and quality services. SWMG receives no compensation in return for these referrals. On occasion, other custodians may be recommended based on the individual client needs.

SWMG custodies the majority of the firms' assets through Charles Schwab and therefore places most of the trades through Schwab's platform. On the occasion that an investment cannot be traded through Charles Schwab, Schwab has in place a system to trade-away through other clearing firms. This is done to gain access to individual investment offerings and the choices of clearing firms are usually limited.

SWMG does not aggregate the purchase or sale of securities for price discounts, but does use the Charles Schwab Trading Applet for certain global trades. These global trades are used to sell and purchase funds when replacing poorly performing investments that are common across client's accounts.

## Review of Accounts

Form ADV Part 2A, Item 13

A. Indicate whether you periodically review *client* accounts or financial plans. If you do, describe the frequency and nature of the review, and the titles of the *supervised persons* who conduct the review.

Strategic Wealth Management Group, LLC will undertake periodic reviews of financial plan it creates only when requested to do so by client. When requested, the review of the financial plan will be undertaken upon substantially the same terms as the original plan. Investment assets are reviewed by SWMG on an ongoing basis and periodic reviews are held with clients. The allocation of the assets may be modified, upon approval by the client, and the performance of the mutual funds, mutual fund managers and individual investments will be evaluated. Appropriate recommendations for mutual fund and other investment changes will be made and may be implemented upon client's approval. SWMG's investment committee will be responsible for determining appropriate changes to client allocation of assets. This committee is comprised of James Griesser, CFP, Shaun Eddy, CFP, James Eichelberger, CFP, Jennine R. LaCroix, CFP, Gary Desjardins, CFP, Joseph Garrison, CFP, Kimberly Magaha, CFP, Chad Foster, CFP and James W. Battle IV, CFP.

B. If you review *client* accounts on other than a periodic basis, describe the factors that trigger a review.

The client's account are reviewed more often if a significant change occurs in the client's personal situation or if there have been significant economic and/or market changes.

C. Describe the content and indicate the frequency of regular reports you provide to *clients* regarding their accounts. State whether these reports are written.

Provide Client with a Current Position, Internal Rate of Return, and Bench Mark Returns. The Current Position Report shows the Percent of Total, Purchase Date, Units, Unit Price and End Market Value. The Internal Rate of Return Report shows Purchase Date, Beginning Period Market Value, Sold Date, End Period Market Value and Period Rate of Return. These reports will be furnished at least semi-annually and may be as often as quarterly. Upon request, the Adviser will furnish to the Client a statement of the income, Capital Gain and Loss Report, and Interest and Dividend Report, etc. with regard to the Client's accounts.

### ***Client Referrals and Other Compensation***

Form ADV Part 2A, Item 14

Strategic Wealth Management Group, LLC maintains a relationship with Brent W. Simmons, CPA PC (BWS). BWS serves as an external solicitor. BWS will receive twenty five percent (25%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with John R. Farrell. John R. Farrell serves as an external solicitor. John R. Farrell will receive twenty five percent (25%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with William LeRoy Frick. William LeRoy Frick serves as an external solicitor. William LeRoy Frick will receive twenty five percent (25%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with Jones & Maresca, LLC. Jones & Maresca, LLC serves as an external solicitor. Jones & Maresca, LLC will receive twenty five percent (25%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with Patuxent Financial Group, LLC (PFG). PFG serves as an external solicitor. PFG will receive twenty five percent (25%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with Devitt Financial Services (DFS). DFS serves as an external solicitor. DFS will receive twenty five percent (25%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with Alms & Associates, Inc. (A&A).

A&A serves as an external solicitor. A&A will receive ten to thirty-five percent (10%-35%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with Evergreen Wealth Advisors, LLC. Evergreen Wealth Advisors, LLC serves as an external solicitor. Evergreen Wealth Advisors, LLC will receive twenty five percent (25%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with Valley Advisors, LLC. Valley Advisors, LLC serves as an external solicitor. Valley Advisors, LLC will receive twenty five percent (25%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with Glass Jacobson Investment Advisors, LLC. Glass Jacobson Investment Advisors, LLC serves as an external solicitor. Glass Jacobson Investment Advisors, LLC will receive twenty five percent (25%) of the compensation received from referral activity.

Strategic Wealth Management Group, LLC maintains a relationship with Wealth One Incorporated. Wealth One Incorporated serves as an external solicitor. Wealth One Incorporated will receive twenty-five to thirty-five percent (25%-35%) of the compensation received from referral activity.

### ***Custody***

Form ADV Part 2A, Item 15

Strategic Wealth Management Group, LLC does not maintain custody of client funds or securities. Strategic Wealth Management Group, LLC will rely on the client's qualified custodian to send quarterly account statements directly to the client. The custodian freezes client's accounts if address is not correct by receiving a non-deliverable notice from the US Postal Service. The Company is informed and the Company contacts the client to sign a change of address form which is provided to the Custodian.

### ***Investment Discretion***

Form ADV Part 2A, Item 16

In that SWMG, LLC may have discretionary authority, it is possible that the firm may determine without obtaining specific client consent the securities to be bought or sold and or the amount of the securities to be bought or sold. In some instances discretionary authority is implied per authorization included in the custodians account application. SWMG, LLC will only use discretionary authority when that client has signed a discretionary management agreement. All other clients will approve activity in their accounts before it occurs.

### ***Voting Client Securities***

Form ADV Part 2A, Item 17

Strategic Wealth Management Group, LLC policy on voting proxies is that the firm does not exercise voting authority regarding proxies on the clients' behalf. The client will be responsible for the voting authority regarding proxies. Upon request, our firm will provide advice on a specific proxy related to that particular client's request, but does not have the authority to vote on the client's proxy. The clients will receive the proxies from the custodian.

***Financial Information***

NOT APPLICABLE

Form ADV Part 2A, Item 18

***Requirements for State-Registered Advisers***

NOT APPLICABLE

***Additional Information***

NONE