



Scioto Wealth Strategies LLC
Form ADV Part 2A, Appendix 1 – Wrap Fee Program Brochure
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This wrap fee program brochure provides information about the qualifications and business practices of Scioto Wealth Strategies LLC. If you have any questions about the contents of this brochure, please contact us at 614-306-1630. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.

You can find more information about Scioto Wealth Strategies LLC at the SEC’s website www.adviserinfo.sec.gov.

Item 2 - Material Changes

This is our first wrap fee program brochure, so there are no material changes at this time. In the future, this Item will be used to provide you with a summary of new and/or updated information. You will receive a summary of any material changes to this wrap fee program brochure within 120 days of the close of our fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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Item 4 – Services, Fees and Compensation

About Us

Scioto Wealth Strategies LLC (“we,” “us” or “Scioto Wealth”) is an investment adviser registered with the SEC.¹ Scioto Wealth was founded in August 2015 by James Frank Parker, Craig Cavicchia and Michael Stafford and is headquartered in Columbus, Ohio.

Wrap Fee Program Services

Scioto Wealth sponsors a “wrap fee” program, and we provide investment management services under the program. In our wrap fee program, a client receives investment advisory and portfolio transaction services for a single fee based on the amount of assets in the account. In our wrap fee program, we will either provide direct discretionary and non-discretionary portfolio management services for your account or select, or advise you regarding the selection of, a third party investment adviser to manage your account. Because the wrap program fee is based on the amount of assets in your account and is not commission-based (i.e., you are not charged a fee for each individual transaction in your account), you may trade in certain investment products without incurring separate brokerage commissions or transaction charges.

Clients establishing a wrap fee account with Scioto Wealth must open a securities brokerage and/or custody account and complete a new account agreement with a broker/dealer or custodian (“Financial Institution”) acceptable to Scioto Wealth. If we manage your account, we will execute all transactions through this Financial Institution. If we retain or recommend that you retain a third party investment manager to manage your account, that investment manager also will execute all transactions through this Financial Institution.

We help clients select an appropriate strategy for managing their assets and financial affairs. The strategy chosen may be a Scioto Wealth strategy or a strategy developed and implemented by a third party investment manager. Scioto Wealth, or the third party investment manager, will then manage the assets in the wrap fee account in accordance with the chosen strategy. In selecting investments and third party investment managers, we consider each client’s risk tolerance, funding needs and investment limitations. Scioto Wealth monitors the performance of those accounts managed by third party investment managers. For additional information about how we select third party investment managers, please see *Item 6 – Portfolio Manager Selection and Evaluation*.

Wrap Fee Program Fees

We charge wrap fee program clients a single fee calculated as a percentage of the assets in the account. The fee covers investment management services and the costs of executing

¹ Registration as an investment adviser does not imply a certain level of skill or training.

trades. If Scioto Wealth directly manages your account, we retain the entire fee to compensate us for our investment management services and to reimburse us for transaction charges assessed by the Financial Institution through which we execute trades in your account. If assets have been allocated to a third party investment manager, we pay a portion of the fee to that investment manager. The portion of the fee paid to third party investment managers will vary depending on the manager selected and the rate we are able to negotiate with that manager. We anticipate that the fees paid to third party managers will range between approximately 0.30% to 0.50% of assets under management, but we may negotiate a fee with a particular manager that is not within that range. The fee you will pay depends on a variety of factors, including the amount of the fees charged by the third party manager (if applicable), the volume of transaction activity in your account, the value of other services provided under the arrangement, the type and size of your account and the total amount of assets we manage for you. Accounts with multiple objectives, specific reporting requirements, portfolio restrictions, and other complexities may be charged a higher fee.

In determining whether to establish a wrap fee program account, you should be aware that the overall cost to you of the program may be higher or lower than the cost you might incur by purchasing separately the types of securities and services available in the program. In order to compare the cost of our wrap fee program with unbundled services, you should consider the following factors:

- trading activity associated with our investment strategies or those of third party investment managers
- the fees charged by other investment advisers for investment advisory services
- commissions we would collect if you established a trading account advised by us (see Item 6, under “Our Advisory Services”), instead of establishing a wrap fee program account
- brokerage commissions that would be charged by your Financial Institution, or at other broker-dealers

Depending upon the total wrap fee charged by our firm (as described more fully in the table below), the amount of portfolio activity in your account, and the value of investment advisory and other services provided, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately and/or if we were to negotiate transaction fees and seek best price and execution of transactions for your individual account. In addition, because our firm must absorb any transaction fees in wrap fee program accounts, we may have a disincentive to trade heavily in those accounts.

Our standard wrap fee schedule is below. Fees shown are on an annual basis.

Client Aggregate Assets	Annual Fee Range
\$0 - \$2,000,000	1.25%
\$2,000,001 - \$5,000,000	0.90%
Over \$5,000,000	0.75%

We reserve the right to negotiate a different fee for your account.

Our fees are paid quarterly in advance and are based on the market value of the assets in your account at the beginning of the calendar quarter. We will deduct our fees directly from your account at your Financial Institution. If you have insufficient cash in your account to pay our fee, we may sell certain of your account assets to pay the fee. Fees are pro-rated for partial periods. If you terminate your agreement with us during a quarter, we will refund a pro rata portion of the fee you paid for that quarter, based on the number of days between the end of the notice period and the end of the quarter.

Other Fees

Your account may be invested in exchange traded funds (“ETFs”), other investment companies (like mutual funds), or private investment funds, such as hedge funds and private equity funds. These investment vehicles may charge internal management fees and expenses, which are disclosed in their prospectuses or offering documents. These fees are not shared with Scioto Wealth. We evaluate these relative annual costs as a part of our investment decision making process.

You could invest in an ETF, other investment company, or private investment fund directly. In that case, you would not receive the services we provide, which are designed in part to help you determine which, if any, investment funds are best suited to your financial condition and objectives. You should review the fees charged by the investment funds and our fees to fully understand the total amount of fees you will pay and to evaluate the advisory services we provide.

Compensation for Recommending the Program

We have no arrangements in place under which persons recommending our wrap fee program are entitled to receive additional compensation as a result of clients’ participation.

Item 5 – Account Requirements and Types of Clients

The minimum account size for a wrap fee program accounts is \$50,000. We reserve the right to waive minimum account size requirements at our discretion.

Scioto Wealth's wrap fee program services are offered to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, financial institutions and small businesses.

Item 6 – Portfolio Manager Selection and Evaluation

As stated above, we help clients select an appropriate strategy for managing their assets and financial affairs. The strategy chosen may be a Scioto Wealth strategy or a strategy developed and implemented by a third party investment manager. Scioto Wealth, or the third party investment manager, will then manage the assets in the wrap fee account in accordance with the chosen strategy.

Because we or a third party may serve as portfolio manager under our wrap fee program, we face a conflict of interest in that we may be incentivized to select Scioto Wealth as the portfolio manager due to the fees that we would receive. We address this conflict of interest by (i) working with you to select the most appropriate strategy for you (whether or not that is a Scioto Wealth strategy) based on your risk tolerance, funding needs, investment limitations, and other factors; and by (ii) evaluating the performance of strategies managed by our investment adviser representatives in a manner similar to that used to monitor strategies managed by third party investment managers, as described below.

Selection and Evaluation of Third Party Investment Managers

As sponsor of a wrap fee program, Scioto Wealth evaluates information about the third party investment managers it selects to manage client assets in the program. We generally review a variety of different resources, which may include the manager's public disclosure documents, materials supplied by the managers themselves, and other third party analyses we believe to be reputable. To the extent possible, Scioto Wealth seeks to assess a third party investment manager's investment strategies, past performance and risk results in relation to our clients' individual portfolio allocations and risk exposures. We also take into consideration each third party investment manager's reputation, financial strength, reporting, pricing, and research capabilities, among other related factors.

On a quarterly basis, we monitor the performance of accounts managed by third party investment managers by reviewing the account statements and trade confirmations produced by the applicable Financial Institutions, as well as other performance information furnished by the managers. Third party managers may be replaced, in whole or in part, to the extent required to ensure account performance is consistent with client objectives and restrictions, if any. We do not verify the accuracy of any performance information furnished by third party managers, and we do not ensure its compliance with presentation standards. You are advised that any performance information you receive from third party investment managers may not be calculated on a uniform and consistent basis.

We advise clients to compare all supplemental materials with the account statements they receive from their respective Financial Institutions. The terms and conditions under which a third party investment manager is engaged are contained in a separate written agreement between Scioto Wealth or the client and the third party investment manager. In addition to this brochure, a client also receives the brochure of the third party investment manager engaged to manage the client's assets.

Our Advisory Services

Scioto Wealth provides personalized, confidential financial planning, investment management and consulting services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. We consult with you and provide advice with respect to:

- Determining your financial objectives
- Identifying financial challenges
- Budgeting, cash flow analysis and debt management
- Retirement needs analysis
- Qualified and non-qualified employee/executive benefit planning
- Financial coaching
- Charitable, college and estate planning
- Tax planning
- Insurance and long term care planning
- Investment and real estate planning
- Business and succession planning

Our services are for clients seeking a personalized approach to implementing an individually customized strategy designed to meet their investment goals and objectives through portfolio monitoring and quarterly reporting. We work with clients to understand their individual investment objectives, liquidity and cash flow needs, time horizon and risk tolerance, as well as any other factors pertinent to their specific financial situations. After an analysis of the relevant information, Scioto Wealth assists its clients in developing an appropriate strategy for managing their assets and financial affairs. We manage client accounts on both a discretionary or non-discretionary basis. This individualized approach allows the us to work with you to achieve your investment goals.

At the beginning of Scioto Wealth's relationship with you, we review your current investment portfolio, obtain information necessary to understand your current and expected financial situation, discuss with you your investment history, objectives, special interests and risk tolerance and make recommendations regarding your portfolio. Additionally, you can participate in regular planning meetings, telephone consultations and educational seminars.

We will work with you to accommodate reasonable restrictions in any investment strategy. You must advise us of any such restrictions in writing, and you should be aware that imposing investment restrictions may adversely affect the performance of your account. There are no differences between how we manage wrap fee accounts and how we manage other accounts, and we receive a portion of the wrap fee as compensation for managing wrap fee accounts.

In addition to our wrap fee program, we offer the following services to assist clients in achieving their unique goals and objectives:

- *Brokerage/Trading Account Services.* Concentrated stock positions, insurance and annuities contracts, real estate investment trusts ("REITs"), business development companies ("BDCs"), private placements or similar products are more appropriately held in a transaction-based, non-wrap fee brokerage account with a broker/dealer acceptable to Scioto Wealth. That is because you are unlikely to trade these securities with any frequency. An account that charges commissions only upon the execution of a securities transaction is more economical than a wrap fee account, which charges an asset-based fee regardless of the number of transactions in the account, if you intend to hold securities for an extended period of time. Our investment adviser representatives also are registered representatives of broker/dealers and we can execute transactions in brokerage accounts on behalf of our clients. We receive front or deferred sales charges or loads, brokerage commissions and other transaction-based compensation when we buy or sell these instruments on your behalf.
- *Consulting Services.* We provide clients with financial consulting services on various matters, including, but not limited to budgeting, tax planning, executive compensation, protection planning, wealth transfer, charitable planning, business and succession planning and educational funding.

Performance-Based Fees and Side-By-Side Management

We do not accept "performance-based fees" (i.e., fees based on a share of capital gains on or capital appreciation of your assets).

Methods of Analysis, Investment Strategies and Risk of Loss

The investment strategies employed by Scioto Wealth share a common philosophy: participate in upside asset price momentum while engaging in systematic methods to avoid

substantial losses. The use of downside protection strategies, or portfolios designed primarily to win by avoiding substantial losses, is an approach that has shown to benefit portfolio performance over the long-term. We believe that applying systematic, rules-based investment processes focused on aligning portfolio exposures with trends in capital markets may prove to be a successful investment approach. Our investment philosophy is grounded in a disciplined approach to allocating assets consistently based on what we believe to be the highest probability events. Scioto Wealth's investment focus is not on beating the benchmark year after year. We believe that this approach may expose client portfolios to excessive risk. Instead, the Scioto Wealth attempts to participate in upside asset class trends while focusing on avoiding material losses that may significantly erode a portfolio's value. We believes this approach may result in portfolio results that beat the benchmark over the long-term, while assuming less risk.

Scioto Wealth employs both fundamental and technical analysis in developing investment strategies for its clients.

- *Fundamental Analysis.* The success of our strategies depends in large part on our ability to accurately assess the fundamental value of securities and capital markets in general. An accurate assessment of fundamental value depends on a complex analysis of a number of economic, financial, operating, legal and other factors. No assurance can be given that we can assess the nature and magnitude of all material factors having a bearing on the value of securities.
- *Technical Analysis.* In implementing our investment strategies, we may also utilize technical analysis, which is the study of asset prices and their movement as influenced by the supply and demand for a particular security. Although employing these techniques may expand the opportunity for gain, it also carries the risks of volatility and loss.

Our research and analysis is derived from numerous sources, including financial media companies, third party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and third party research.

When we manage client accounts, we generally employ a long-term investment strategy consistent with our client's financial goals. We typically will hold all or a portion of a security for more than a year, but may hold for shorter periods in order to rebalance a portfolio, meet a client's cash needs, or respond to poor investment performance. In addition, Scioto Wealth may at times 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. However, we do not utilize frequent trading. Frequent trading may results in higher transactional costs and may cause deterioration in investment performance. Frequent trading also may cause additional tax consequences (i.e., higher taxes) for the client.

In managing a portfolio, Scioto Wealth principally recommends investment in ETFs, mutual funds, hedge funds and other investment companies or private investment funds, as well as

individual equity securities. These securities may be subject to material loss of principal or loss of principal in its entirety.

All investments in securities include a risk of losing your principal (invested amount) and any profits that you have not yet realized. You should be prepared to bear that risk. As you know, the stock and fixed income markets fluctuate substantially over time. In addition, as recent global and domestic economic events have shown, the performance of any investment is not guaranteed.

Voting Client Securities

We do not accept authority to vote client securities. Proxy materials generally will be received by you directly or forwarded to you by your Financial Institution. We encourage you to contact your Financial Institution if you have questions related to proxy materials.

Item 7 – Client Information Provided to Portfolio Managers

Clients participating in our wrap fee program generally provide us with certain nonpublic information, and they grant us the authority to discuss such information with the third party investment managers engaged to manage their accounts. Depending upon the specific arrangement, you may give us, and we may be authorized to disclose, personal information that includes (without limitation) names, phone numbers, addresses, social security numbers, tax identification numbers and account numbers. We also may ask you for, and share with third party managers, certain information related to your financial positions, investment objectives, risk tolerance and other information in an effort to ensure that investment decisions made for your account remain aligned with your best interests. This information is communicated on an initial and ongoing basis, or as otherwise necessary to the management of our clients' portfolios.

Item 8– Client Contact with Portfolio Managers

We do not impose restrictions on a client's ability to correspond or otherwise communicate with us directly. Our wrap fee program clients generally only communicate with Scioto Wealth and do not directly contact third party investment managers servicing their accounts.

Item 9 – Additional Information

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management.

Scioto Wealth has no legal or disciplinary events to report²

Other Financial Industry Activities and Affiliations

We are obligated to disclose whether Scioto Wealth or any of its officers or employees are involved in other financial industry activities, such as those of a broker-dealer, commodity pool operator or a futures commission merchant. We are also obligated to disclose if we receive compensation from other advisers for recommending or selecting those advisers for you.

All of our investment adviser representatives also are registered representatives of Charles Schwab & Co. (“Schwab”). This may create a conflict of interest for our brokerage/trading account clients (but not wrap fee program clients) because Scioto Wealth does not charge a fee for managing assets in brokerage/trading accounts. Instead, we will accept sales loads (charges) and brokerage commissions for transactions placed with unaffiliated broker/dealers we utilize to execute transactions in the account. These commissions are separate from and in addition to any fees paid in wrap fee accounts or for consulting services. This practice may present a conflict of interest and give us an incentive to recommend investment products based on compensation received rather than on your needs. We manage this conflict by trading in your brokerage/trading account only with your authorization and only after disclosing to you the compensation we will receive for executing the trade. In addition, you have the option to purchase or sell investment products that we recommend through other broker/dealers with whom we are not associated.

We anticipate owning a non-controlling interest in Bower Hill Capital Management (“Bower Hill”), a registered investment adviser and Bower Hill anticipates holding a non-controlling interest in our firm. Bower Hill is a third party investment manager in our wrap fee program, and we utilize portfolios constructed and managed by Bower Hill when it is in the best interest of our clients to do so. As a non-controlling member, we do not have rights to a share of the profits earned by Bower Hill, but we do have rights to a share of the proceeds (if any) if Bower Hill is at some point in the future acquired by another entity.

² We note that registered advisers are required to report, in Part 1A of Form ADV, all disciplinary events regardless of whether they are material. Scioto Wealth has no disciplinary events of any kind to report.

Code of Ethics, Participation in Client Transactions and Personal Trading

We expect our investment adviser representatives to always act in your best interests, and to place your interests ahead of their own. We have adopted a Code of Ethics (the “Code”) that sets forth the standard of business conduct expected from each member of our team.

The Code restricts trading in any security for which we believe we may be privy to material non-public information. It also places restrictions on trading by our managers and investment adviser representatives (which we refer to as “personal trading”) to prevent any conflict of interest between personal trading and client trading. The Code limits gifts and entertainment, whether received or given, to avoid conflicts of interests. The Code causes all outside business activities of our team members to be disclosed so that potential conflicts can be detected and addressed. Finally, it limits the political contributions of our managers and investment adviser representatives to prevent any potential conflicts in that area as well. All our managers, investment adviser representatives and employees must accept in writing the terms of the Code upon employment, annually, and as amended.

We will provide a copy of the Code to any client or prospective client upon request. If you would like a copy, please contact our Chief Compliance Officer at the telephone number or the address specified on the cover page of this brochure.

The strategies we use to manage client accounts also are used to manage accounts maintained by Scioto Wealth, its members, investment adviser representatives and employees. As a result, we (or our members, investment adviser representatives and employees) may (i) invest in the same securities or related securities (for example, warrants, options or futures) that we recommend to our clients, (ii) buy or sell securities for our own accounts at the same time that we recommend, buy or sell the same securities for client accounts, or (iii) include buy or sell orders in an aggregated transaction along with client buy or sell orders. To address any potential conflicts of interest from this practice, we may not trade in a manner that would be adverse or detrimental to client trades, and we always allocate partially filled orders to client accounts before allocating to our accounts.

We do not buy or sell for your account securities in which Scioto Wealth, or its members, investment adviser representatives or employees, have a material financial interest.

Review of Accounts

Our investment adviser representatives review client accounts quarterly and may reposition assets to bring the actual allocations closer to the chosen strategy’s target allocations, unless the client has requested otherwise. Account transactions are reviewed on an ongoing basis to ensure consistency with client objectives and restrictions, if any. Significant market or client-specific events may cause us to review an account on a more frequent basis. Our investment adviser representatives meet with clients in-person, by telephone or via webcasts on an agreed upon basis, but on at least an annual basis. Clients

are encouraged to notify Scioto Wealth of any changes in their financial situation, needs or investment objectives, or the suitability of the investment strategy developed for them.

Clients receive transaction confirmation notices and regular summary account statements directly from the Financial Institution holding their accounts. Scioto Wealth also provides clients with periodic reports. These written reports generally contain account holdings, investment results and other data relevant to your account. We urge clients to carefully review these reports and compare the statements received from the Financial Institution with the reports that we provide. The information in our reports may vary from the Financial Institution's statements based on accounting procedures, reporting dates or the valuation methodologies of certain securities.

No Compensation for Client Referrals

We do not currently compensate any person for client referrals.

Other Compensation

Other than the compensation described in Item 4, Scioto Wealth does not receive any compensation from anyone other than its clients.

Benefits from Custodians

We may recommend that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc., a registered broker-dealer, to maintain custody of clients' assets and to effect trades for their accounts. The final decision to custody assets with Schwab is yours to make. We are independently owned and operated and not affiliated with Schwab. Schwab provides us 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 advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, 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 Scioto Wealth client accounts maintained in Schwab's custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Scioto Wealth is absorbing these fees and is not passing them on to its clients.

Schwab also makes available to us other products and services that benefit us but may not benefit our clients' accounts. These benefits may include educational events organized or sponsored by Schwab Advisor Services. Other potential benefits may include occasional

business entertainment of our personnel by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities.

Other of these products and services provided by Schwab assist us in managing and administering client accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of our fees from client accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of our accounts, including accounts not maintained at Schwab Advisor Services.

Schwab Advisor Services also makes available to us other services intended to help us manage and further develop our business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to us by independent third parties. Schwab Advisor Services 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 us. While, as a fiduciary, we endeavor to act in our clients' best interests, our recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to us of the availability of some of the foregoing products and services and other arrangements 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.

Financial Information

In certain circumstances, registered investment advisers are required to provide clients or prospective clients with financial information or disclosures about their financial condition. Scioto Wealth has no financial commitments that impairs our ability to meet our contractual or fiduciary commitments to you and has never been the subject of any bankruptcy proceeding.

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