

Fortitude Advisory Group L.L.C.

Part 2A Appendix 1 of Form ADV Wrap Fee Program Brochure March 13, 2020

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This wrap fee program brochure provides information about the qualifications and business practices of Fortitude Advisory Group L.L.C. (“Fortitude”). If you have any questions about the content of this brochure, please contact us at the phone number above. Fortitude is registered with the United States Securities and Exchange Commission (“SEC”) as an investment adviser; however, such registration is not intended to imply a certain level of skill or training. This Brochure has not been approved by the SEC or by any state securities body or regulatory authority.

Additional information about Fortitude also is available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2 – SUMMARY OF MATERIAL CHANGES

None

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ITEM 4 - SERVICES, FEES & COMPENSATION

I. DESCRIPTION OF FORTITUDE

Fortitude Advisory Group L.L.C. (“Fortitude”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser under the Investment Advisers Act of 1940, as amended (“Advisers Act”). Its principal place of business is in Gig Harbor, Washington. Fortitude began conducting business in November of 2001 under the name Argentus Advisors, LLC, as a wholly owned subsidiary of SAS Capital Partners, LLC. On or about September 29, 2016, Sound Wealth Partners (“SWP”) became the sole owner of Fortitude. SWP is effectively 50% owned by each of Craig Johnsen and Ryan Finnigan.

Fortitude’s investment advisory services are tailored to the individual needs of its clients and are based on the client’s goals, investment objectives, time horizon and risk tolerance. In this capacity, Fortitude acts as a fiduciary to its clients. Fortitude generally provides investment advisory services through its investment adviser representatives (referred to as “Financial Advisors”). Financial Advisors may recommend the purchase or sale of securities or they may recommend the use of one or more third-party money managers (each, a “Third Party Money Manager”).

Fortitude, through its Financial Advisors, provides continuous investment advice to its clients based on the individual needs of each client. The Financial Advisor will discuss a client’s financial situation and will help the client establish financial goals, investment objectives, time horizons and risk tolerance. The Financial Advisor also reviews and discusses with clients the clients’ prior investment experiences, all in an effort to ensure that the advisory services provided are appropriate.

Clients may elect to impose reasonable restrictions on investing in certain securities, types of securities, companies and/or industry sectors. However, Fortitude may refuse to continue offering advisory services if it determines that such restrictions cannot be accommodated. When advisory services are discontinued, client account(s) will be subject to the terms and conditions of the agreement between you and the custodian and all advisory services and fees will no longer apply.

II. WRAP FEE PROGRAM ACCOUNTS

A wrap fee program is an investment advisory program in which you pay one fee that includes investment advisory fees and the transaction costs (i.e., brokerage commissions) in your account. Depending on the types of securities in a wrap fee program account and how much trading you expect to do, you may pay more for a Wrap Fee Program account than if you chose an advisory program that does not have a “wrap fee” offering, or if you chose to pay separately for all of your transaction costs (i.e., pay the advisory fee plus all transaction (brokerage) commissions separately). In general, a client whose account is actively traded would benefit more from a wrap fee program than a client whose account is traded infrequently. Similarly, a client whose account primarily purchases and sells exchange-traded equities through a broker would benefit more from a wrap fee program than a client whose account primarily invests in mutual funds or that purchases and sells over-the-counter securities from or to dealers in principal transactions. This is because a wrap fee account will bear the same expenses as a traditional account when it invests in mutual funds, e.g., sales charges, fund expenses, and there is no brokerage fee involved in OTC or dealer principal transactions as the dealer charges or takes a markup or mark down.

Your Financial Advisor may receive more compensation from your participation in a wrap fee program account than he would from your participation in a traditional advisory program in which you pay separately for advisory, brokerage and custodial services. Further, your Financial Advisor may be incentivized to cause your account to trade infrequently, or to cause your account to trade only in readily tradeable and liquid securities. Basically, anything that can be done so as to reduce

actual brokerage costs may result in better economics to Fortitude and the Financial Advisor. This is a potential conflict of interest that you should be aware of and that you should discuss with your Financial Advisor.

Your Financial Advisor will work with you to recommend whether you should utilize a wrap fee program or not, based on your individual circumstance and anticipated trading activity. Please discuss with your Financial Advisor all fees and costs associated with your wrap fee program. For further information regarding Fortitude's traditional advisory programs, please request and review a copy of Fortitude's brochure from your Financial Advisor.

The following are the types of advisory services that Fortitude provides.

Financial Advisor Directed Accounts

A Financial Advisor directed account is one in which the account and the selected portfolio is managed by the Financial Advisor, either on a discretionary or non-discretionary basis. The Financial Advisor will recommend various investments, e.g., stocks, bonds, ETFs, and other appropriate investments, to help a client develop a portfolio designed to meet his or her financial goals and objectives. Because each type of investment involves varying degrees of risk, the Financial Advisor will only make recommendations that are consistent with a client's stated goals, investment objectives, risk tolerance, time horizon and liquidity needs. The Financial Advisor will periodically discuss the portfolio's investments with the client and recommend any changes to the portfolio if necessary to remain consistent with the client's financial goals and investment objectives.

Third-Party Money Manager Accounts

In lieu of recommending individual investments under a Financial Advisor directed account, the Financial Advisor may assist a client in selecting one or more Third-Party Money Manager(s). The Financial Advisor may examine a number of factors in determining a prudent Third-Party Money Manager or Managers including performance, investment objectives, fees, and comparing those factors to the client's stated goals and objectives (determining risk tolerance and investment styles).

Third Party Money Managers may either be Portfolio Strategists or Portfolio Managers. Portfolio Strategists provide recommended asset allocation strategies that Fortitude will generally follow in investing a client's portfolio, unless circumstances dictate that it should be modified or supplemented. Portfolio Strategists do not have discretion to trade your account and do not provide discretionary asset management services; rather, direct management of the client's assets is performed by Fortitude. Clients may elect to employ a Portfolio Strategist for all or a portion of his or her account.

Portfolio Managers also provide recommended strategies, however, they are generally provided with discretionary authority to effect transactions. Clients provide Portfolio Managers with discretionary authority through their advisory agreements with Fortitude. As with Portfolio Strategists, a client may employ one or more Portfolio Managers.

Your Financial Advisor will assist you in understanding and evaluating the services provided by any Third Party Money Managers selected. If the Financial Advisor determines that a selected Third-Party Money Manager is not managing your portfolio in a manner consistent with your stated investment objectives or your financial situation changes such that the Third-Party Money Manager's services are no longer appropriate, the Financial Advisor may recommend a more appropriate Third Party Money Manager for your account.

A Third-Party Money Manager may recommend investing client assets in, or invest client assets in, one or more of its affiliated mutual funds, i.e., a mutual fund for which it or an affiliate serves as investment adviser (an "Advised Mutual Fund"). When an Advised Mutual Fund is utilized in a client's portfolio, the Third Party Money Manager receives fees directly from the client's account, as well as advisory fees as adviser to the Advised Mutual Fund.

Third Party Money Managers, in certain instances, may be compensated for the distribution or sales of Advised Mutual Funds, which creates a conflict of interest.

Combined Financial Advisor Directed and Third-Party Money Manager Services

You may elect to take advantage of Financial Advisor directed account services, as well as employ the services of one or more Third-Party Money Managers for your account(s).

III. WRAP FEES

This section is intended to assist you in understanding the costs associated with Fortitude's wrap fee programs. You should read this section carefully and also refer to your investment advisory agreement for a full description of the amount, terms, and calculation of the advisory fee, as well as, information concerning ticket charges, refunds and contract termination. The fees and costs may be more or less than if you purchased a portfolio of similar investments through a brokerage arrangement or similar services through another investment adviser. It is important that you evaluate the services received in light of the wrap fee and other costs, if any. Wrap fees may be negotiated.

In a wrap fee program, Fortitude charges a single fee based on the value of a client's assets under management. The single fee includes portfolio management, trading commissions, and custody services. Fees are calculated and deducted on a periodic basis (either monthly or quarterly) in advance or in arrears. If charged in advance, the fee will be assessed in advance of services being rendered and will be based on the value of the client assets under management on the last day of the prior period. For deposits during a period, including the initial deposit, the fee will be prorated over the billing period to account for the days advisory services were or will be provided. If the agreement is terminated during a period, any unearned fees collected in advance will be credited back. Fortitude may not pro-rate deposits or withdrawals that are *de minimis*. If charged in arrears, the fee will be assessed at the end of the period for which services were already provided. The fee calculation will be based on the value of the client assets under management on the last day of the period. For deposits or withdrawals during the billing period, including the initial deposit or final withdrawal, the fee will be prorated over the billing period to account for the days services were rendered. If you terminate your agreement, any uncollected, earned fees will be due and payable by you immediately and will be deducted from the managed assets promptly.

You should be aware that you may incur additional fees assessed by your custodian or by the individual investments within your account. Custodians may charge administration fees and other fees. Please refer your custodial agreement(s) to help you understand what fees you may apply. Additionally, some investment product sponsors, such as those for mutual funds, ETFs, etc., assess their own management fees. Such fees are in addition to the advisory fees you pay Fortitude. You should consult with your Financial Advisor and discuss all the fees applicable to your account and investment selections before making any investment or buying decisions.

When you enter into an investment management agreement with Fortitude, you authorize our firm to deduct the investment management fees directly from your account. Whether the investment management fee is assessed in advance or in arrears, and whether you are charged based on the account value at period end or its average daily balance during a quarter, is stated in your investment management agreement.

Fee Schedule and Maximums

Fortitude does not utilize a set advisory fee schedule for its advisory services. Instead, your advisory fee is based on a number of factors, including fees charged by Third Party Money Managers, the size of the account, the investment strategy and the projected number of transactions that will be effected.

However, Fortitude has a maximum Total Portfolio Management Fee of 2.60% per year. The specific fee you pay for advisory services offered by us is stipulated in your advisory agreement. All fees are negotiable.

ITEM 5 - ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Fortitude has an account program minimum of \$25,000; however, this minimum requirement is at our sole discretion as there may be extenuating circumstances that may make it reasonable to accept an account with a lesser value. Each individual Third-Party Money Manager has its own portfolio value minimums. These minimums are listed in your advisory agreement and should be discussed in further detail with your Financial Advisor.

Fortitude generally provides investment advisory services to individuals, including high net worth individuals. To a lesser extent, it may also provide services to pension and profit sharing plans (other than plan participants), charitable organizations, and corporations or business entities.

ITEM 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION

METHODS OF ANALYSIS

If a client's account is a Financial Advisor Directed Account, there is no portfolio manager selection as the portfolio is managed by the Financial Advisor, either on a discretionary or non-discretionary basis. The Financial Advisor will recommend various securities, stocks, ETFs, etc. to help a client develop a portfolio designed to meet his or her financial goals and objectives. Because each type of investment involves varying degrees of risk, the Financial Advisor will only make recommendations that are consistent with a client's stated goals, investment objectives, risk tolerance, time horizon and liquidity needs. The Financial Advisor will then meet with the client regularly to discuss the portfolio's investments and to recommend any changes to the portfolio if necessary to remain consistent with the client's financial goals and investment objectives.

Each Financial Advisor selects from a variety of sources from which he obtains information and data concerning investments, which is used to formulate clients' individual investment strategies. The main information sources include, but are not limited to:

- Financial programs and financial websites;
- Financial newspapers and magazines;
- Research materials prepared by others;
- Timing services;
- Annual reports, prospectuses, filings with the SEC; and/or
- Company press releases.

A Financial Advisor may use charting, fundamental and/or technical analysis methods to formulate the investment advice that they provide. Clients should ask questions and be familiar with the sources of information used by Financial Advisors.

INVESTMENT STRATEGIES

Buy and Hold

Portfolio managers may purchase, or recommend for purchase, securities with the idea of holding them in the

client's account for a year or longer. Typically the manager will employ this strategy when:

- The manager believes the securities to be currently undervalued, and/or
- The manager wants exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, the manager may not take advantage of short-term gains that could be profitable to a client. Moreover, if the analysis is incorrect, a security may decline sharply in value before the manager makes the decision to sell.

Short-Term Purchases

When utilizing this strategy, a portfolio manager may purchase securities with the idea of selling them within a relatively short time (typically a year or less). The manager will do this in an attempt to take advantage of conditions that it is believed will soon result in a price swing in the securities purchased.

Trading

Portfolio managers may purchase securities with the possibility of selling them quickly (typically within 30 days or less). This is done in an attempt to take advantage of predictions of impending brief price swings based on analysis.

Utilizing a trading strategy creates the potential for sudden losses if the anticipated price swing does not materialize. Moreover, under those circumstances, the portfolio manager must either take a long-term position in a security that was designed to be a short-term purchase or take a realized loss. In addition, because this strategy involves more frequent trading than does a longer-term strategy, there could be a resultant increase in brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Short Selling

Portfolio managers may borrow, or recommend to borrow, shares of a stock for your portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed shares are then sold. Subsequently, the manager buys the same stock and returns the shares to the original owner to close the open short position. Portfolio managers engage in short selling based on an opinion that the stock will go down in price after the shares have been borrowed. If the manager is correct and the stock price has gone down since the shares were borrowed from the original owner, the client account realizes the profit.

Short selling results in some unique risks:

- Losses can be infinite. A short sale loses when the stock price rises, and a stock is not limited (at least, theoretically) in how high it can go. For example, if you short 100 shares at \$50 each, hoping to make a profit but the shares increase to \$75 per share, you'd lose \$2,500. On the other hand, the price of a stock cannot fall below \$0, which limits your potential upside.
- Short squeezes can wring out profits. As stock prices increase, short seller losses also increase as sellers rush to buy the stock to cover their positions. This increase in demand, in turn, can further drive the price of the stock up.
- Timing. Even if a portfolio manager is correct in determining that the price of a stock will decline, the manager runs the risk of incorrectly determining when the decline will take place, i.e., being right too soon. Although a company may be overvalued, it could conceivably take some time for the price to come down; during which time you are vulnerable to margin calls, opportunity costs, etc.
- Inflation. History has shown that over the long term, most stocks appreciate. Even if a company barely improves over time, inflation should drive its share price up somewhat. In fact, short selling may not be appropriate in times of inflation for that very reason, as prices may adjust upwards regardless of the value of the underlying company.

Strategic vs Tactical

Portfolio managers may have their own unique strategies that they employ when managing portfolios. Two common asset management approaches are “strategic” and “tactical.”

Strategic: A strategy that sets specific asset class allocations and then, periodically, rebalances the managed portfolio to maintain the original asset class allocation. There is typically no change in the assets classes utilized in this type of strategy.

Tactical: A strategy that takes a more active trading approach to investing and makes tactical market trades in portfolios in an attempt to take advantage of perceived market opportunities. This could mean a complete replacement of a poor performing asset class to an assets class expected to perform better.

Prior to investing with any portfolio manager, clients are encouraged to ask questions and understand the investment strategies recommended by your Financial Advisor.

RISK OF LOSS

General Risk

Investing in securities involves risk of loss that clients should be prepared to bear. Fortitude does not represent or guarantee that it can predict future results, successfully identify market tops or bottoms, or insulate client portfolios and investments from losses. The prices of, and the income generated by, equities and other securities held in your portfolio might decline in response to certain events taking place around the world, including those directly involving the issuers whose securities you own. Conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; governmental or governmental agency responses to economic conditions; and currency, interest rate and commodity price fluctuations are all risk factors that can affect the valuation of your investments.

Fortitude cannot offer any guarantees or promises that a client’s financial goals and objectives will be met. Past performance is in no way an indication of future performance. The value of a client’s investments will be subject to a variety of factors, such as the liquidity and volatility of the securities markets. Portfolio transactions may give rise to tax liability, for which clients are responsible.

Asset Allocation Risk

Asset allocation risk is the risk that a client’s portfolio may be allocated to an asset class that underperforms other asset classes. For example, fixed-income securities may underperform equities. Accordingly, asset allocation risk will be influenced by the allocation of a client’s portfolio among equities, fixed income, alternative and money market securities.

Investment and Market Risk

Securities purchased in client account(s) are subject to investment risk, including the possible loss of the entire principal amount invested. A recommendation to invest in securities and other instruments may also involve market risk, which is the risk that the value of these positions, like other investments, may move up or down, sometimes rapidly and unpredictably due to adverse market conditions and not necessarily based on the individual merits of the investment. Investment holdings in your account, at any point in time, may be worth less than the original investment, even after taking into account any reinvestment of dividends.

Interest Rate Risk

Fluctuations in interest rates may cause the value of investments to fluctuate. For example, the value of fixed income instruments will change inversely with changes in interest rates. As interest rates rise, the market value of fixed income instruments tends to decrease. Conversely, as interest rates fall, the market value of fixed income instruments tends to increase. This risk will be greater for long-term securities than

for short-term securities.

Counterparty Risk

Certain assets will be exposed to the credit risk of the counterparties when engaging in exchange-traded or off-exchange transactions as such counterparties could fail to deliver or otherwise default on their obligations. There may also be a risk of loss of assets on deposit with or in the custody of a broker in the event of the broker's bankruptcy, the bankruptcy of any clearing broker through which the broker executes and clears transactions, or the bankruptcy of an exchange clearinghouse.

Liquidity Risk

Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. When investing in illiquid securities, it may not be possible to sell such securities at the most opportune times or at prices approximating the value at which they were purchased.

Exchange Traded Funds (ETFs)

While investing in ETFs has similar risks as investing in individual equities, ETFs typically invest in a diverse group of securities. The level of diversification varies by ETF. While ETFs reduce the effects of concentration risk as compared to investing in a single security, certain ETFs are susceptible to industry, commodity or country risk. Investing in a diverse selection of ETFs may help to reduce this risk. Another important factor to consider with ETFs is that the portfolio of securities in which they invest are typically not actively managed. Leveraged and Inverse ETFs bear unique risks that investors who wish to trade in these should understand. It's important to read the appropriate prospectus or disclosure document specific to the leveraged or inverse ETF before investing.

Fixed Income Investments

One of the most important risks associated with fixed-income securities is interest rate risk, the risk encountered in the relationship between bond prices and interest rates. The price of a bond will change in the opposite direction of movements in prevailing interest rates. For example, as interest rates rise, bond prices will generally fall. If an investor has to sell a bond prior to the maturity date, an increase in interest rates could mean that the bondholder will experience a capital loss (i.e., selling the bond below its original purchase price).

Reinvestment risk is the risk that the interest rate at which the interim cash flows can be reinvested will decline and thus reinvestments will receive a lower interest rate. Reinvestment risk is greater for longer holding periods.

Default risk is commonly referred to as "credit risk" and is based on the probability that the issuer of the debt obligation may default. Default risk is rated by quality ratings assigned by commercial rating companies.

Call risk is the risk related to call provisions on debt obligations. You should be aware of four risks associated with call provisions. The cash flow patterns of callable bonds are not known with certainty.

Since the issuer will typically exercise their right to call the bonds when interest rates have dropped, you may be exposed to reinvestment risk. You would have to reinvest the proceeds after the bond is called at relatively lower interest rates. The potential for capital appreciation of a callable bond is reduced relative to that of a non-callable bond, because its price may not rise much above the price at which the issuer can call the issue. If the issue is purchased at a premium, you may lose the difference between the purchase price and call price.

Inflation risk arises because the value of the cash flows being received from a debt obligation may actually lose purchasing power over the course of time due to the effects of inflation.

Liquidity risk depends on the ease with which an asset can be sold at or near its current value. The best indicator to measure an issue's liquidity is the size of the spread between the bid price and the ask price quoted by a dealer. A wider spread on the asset indicates a greater liquidity risk. If you plan on holding a bond until its maturity date, liquidity risk is less of a concern.

Finally, exchange rate risk, which is encountered in non-dollar denominated bonds or bonds whose payments occur in a foreign currency, has unknown U.S. currency cash flows. The dollar cash flows are dependent on the exchange rate at the time the payments are received. For example, consider a bond whose coupon payment is paid out in Japanese yen. If the yen depreciates relative to the U.S. dollar, fewer net dollars will be received. Conversely, if the yen should appreciate relative to the U.S. dollar, the investor will benefit by receiving more net dollars.

Alternative or Illiquid Investments

Some Financial Advisors and some strategies utilize "illiquid investments." These are securities and other financial instruments that are not actively or widely traded and may have a limited or non-existent secondary market (e.g., non-exchange traded REITs, hedge funds and other private funds, managed futures funds or business development companies). As a result of the limited or non-existent secondary market, it may be difficult to dispose of such investments rapidly and/or at a reasonable value when a liquidation or withdrawal request is made. This is particularly true during times of adverse market conditions. Adverse market conditions have, in the past, lead to a "liquidity crisis" (i.e., the inability to sell many securities at expected values). Neither Fortitude, nor any Financial Advisor makes any assurance or guarantee that future market conditions will not result in similar liquidity issues. Investors in Illiquid Investments should carefully consider the unique risks these types of securities present before making any investment decisions.

International Investing

Investing in the global market can assist with diversification of a portfolio but it is important to consider some of the unique risks with such a strategy. Each country has unique rules and regulations covering business entities and their stock markets, which offer investors varying degrees of protection. Additionally, investing in foreign markets subjects your investment to currency risk.

Additional risk information may be available in a product's prospectus, offering circular or on the product sponsor's web site. Additional product specific risk information is available through the investor section of www.sec.gov. Please review these resources for more detailed information on the risks related to the specific investments in your portfolio.

Fortitude, as a matter of policy does not vote proxies on behalf of Clients. Clients will receive their proxies or other solicitations directly from the applicable custodian. Clients may contact their Advisor to discuss any questions they may have with a particular solicitation.

THIRD-PARTY MANAGER EVALUATION

Portfolio Strategists

Fortitude will enter into arrangements with selected, unaffiliated Third-Party Money Managers whereby it gains access to their proprietary investment portfolio models. These Third-Party Money Managers are in the business of constructing portfolios with specific investment objectives in mind. Through these arrangements, the Third-Party Money Managers have the obligation to make known to Fortitude the exact investments they purchase and sell in the construction of their portfolios and Fortitude has the right to use that information to purchase and sell the same investments for its clients. In these arrangements, an Fortitude client does not become a client of a Third-Party Money Manager. Instead, Fortitude will provide clients with a "Manager Fact Sheet" along with and at the time you enter into an advisory agreement with Fortitude. This Manager Fact Sheet describes such Third-Party Money Manager's

portfolio goals, investment objectives and risk profile. These Third-Party Money Managers are referred to as “Portfolio Strategists” in your advisory agreement. Your Financial Advisor has the responsibility to assess and help determine which, if any, of the services provided by the TPMM’s are suitable for you.

Portfolio Managers

In some cases the Third-Party Money Managers manage a client account as a “separately managed account” (or SMA). With these arrangements, the Third-Party Money Managers have discretion over all or a portion of clients’ account assets and will purchase and sell securities consistent with the particular portfolio’s stated investment objectives and risk profile. These Third-Party Money Managers are referred to as “Portfolio Managers.” When a Portfolio Manager is managing a client’s account, the client will be provided with such Portfolio Manager’s disclosure brochure that describes the portfolio services in greater detail.

Overlay Services

Third-Party Money Managers may provide “overlay services” for client accounts. If you elect to utilize overlay services, the Third-Party Money Manager selected will provide discretionary investment management services. The overlay services attempts to harmonize various program accounts or assets for trading and/or tax-efficiency purposes and employs strategies such as hedging and leveraging across a portion or all of a client’s program portfolios. Overlay services often involve the use of options contracts.

Third Party Money Manager Selection Process

Fortitude employs a multiphase approach to researching and selecting Third-Party Money Managers whose models are acceptable for inclusion in its wrap fee program. Such Third-Party Money Managers are evaluated using data and information from several sources, including the Third-Party Money Manager itself and independent databases. Among the types of information analyzed are historical performance, investment philosophy, investment style and historical volatility. Also reviewed are the Third-Party Money Managers’ Form ADV disclosure brochures and portfolio holdings reports, which help us evaluate the securities selection process. To ensure accuracy, Fortitude attempts to verify all information by comparing it to publicly available sources. The investment professionals at the Third-Party Money Managers are a primary source of information to Fortitude, providing quantitative and qualitative information.

Once a Third-Party Money Manager is approved, Fortitude performs on-going due diligence to ensure the Third-Party Money Manager is meeting expectations. If a Third-Party Money Manager is not meeting expectations, Fortitude will monitor the Third-Party Money Manager and determine if and when it should be excluded from the program.

ITEM 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

When an account is opened, Fortitude communicates relevant information the client provides to, or develops with, Fortitude regarding the client’s investment objectives, time horizons and risk tolerance to each selected Third-Party Money Manager that is a Portfolio Manager. Financial Advisors periodically discuss with clients their financial situations, objectives, etc. and update client files and account information accordingly. When material changes occur in a client’s financial situation or investment objective, the Financial Advisor will advise the client accordingly and, if necessary, add or drop Third-Party Money Managers as appropriate.

Third-Party Money Managers that are Portfolio Strategists are not provided access to client personal information.

ITEM 8 – CLIENT CONTACT WITH PORTFOLIO MANAGERS

You may contact your Financial Advisor or Fortitude directly to inquire about and discuss any wrap fee program offered. Any meeting with a Portfolio Strategist or Portfolio Manager would typically be arranged by your Financial Advisor.

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 a client's evaluation of the investment adviser or the integrity of its management. Neither Fortitude, its owners, nor its management have been involved in any legal or disciplinary events that would have a material impact on a client's evaluation of Fortitude's advisory business or the integrity of its management.

Your Financial Advisor should provide, along with this brochure, a supplement that describes his or her education, business experience, professional designations and material legal or disciplinary history, if any.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

General Description of Ownership Structure

Fortitude is wholly owned by SWP, which was purchased by KCSL Ventures LLC and DKJ Ventures, LLC, with each entity owning 50% (fifty percent) of Fortitude. Craig Johnsen and Ryan Finnigan indirectly own Fortitude through their ownership of DKJ Ventures LLC and KCSL Ventures, LLC, respectively.

Broker-Dealer Registration

Financial Advisors providing investment advice on behalf of Fortitude who are registered representatives of an unaffiliated broker-dealer may recommend their broker-dealer for brokerage services. These individuals are subject to applicable rules that restrict them from conducting securities transactions away from their broker-dealer unless the broker-dealer provides the Financial Advisor with written authorization to do so. Therefore, these individuals may be limited to conducting securities transactions through their broker-dealer. It may be the case that such broker-dealers charge higher transaction fees and/or custodial fees than other broker-dealers charge for the same services. Also, if transactions are executed through these broker-dealers, these Financial Advisors (in their capacity as registered representatives of the brokerage firm) may earn commission-based compensation as a result of placing the recommended securities transactions through their broker-dealer. This practice presents a conflict of interest because the Financial Advisor has an incentive to effect transactions for the purpose of generating a commission rather than solely based on your best interest. Additionally, this practice may preclude Fortitude from achieving best execution within such an advisory account. You may utilize the broker-dealer of your choice, however, if you want your Financial Advisor to be the Financial Advisor of record for your account and you do not choose the broker-dealer your Financial Advisor is a Registered Representative of, we may not be able to accept your account.

Insurance Agents and Agencies

Certain Financial Advisors are also licensed insurance agents. As insurance agents, these persons receive separate, yet customary, commission compensation and/or trailing commissions resulting from the sale of insurance products and services they may recommend.

General Disclosure Regarding Registered Representatives and Insurance Agents

Commission-based sales may incentivize a person to recommend a commissionable product based on the compensation received, rather than based on a client's needs. Offering such products and services to advisory clients may present a conflict of interest. Clients should be aware of this conflict and should inquire further if necessary.

Each Financial Advisor is required to provide clients with this disclosure document along with a personal disclosure document which describes whether he or she is a registered representative or insurance agent, or conducts other outside business activities that may present a conflict of interest. Providing these disclosure documents is an important requirement for mitigating these real or potential conflicts.

Fortitude does not compensate its Financial Advisors any more or less for the advisory services it offers, regardless if the asset management services are directed by the Financial Advisor directly or whether a client uses the services of one or more model portfolios or Third-Party Money Managers, or whether any Advises Mutual Funds are recommended. This compensation practice, along with the requirement that clients receive this disclosure brochure prior to or at the time an advisory contract is entered into with Fortitude are among the methods we utilize to help mitigate these conflicts.

Other Investment Advisers

Fortitude provides an advisory service by which its Financial Advisors can recommend and select Third-Party Money Managers to manage all or a part of your portfolio. These Third-Party Money Managers assess a "program fee" for their services, which is paid out of the advisory fee clients pay. These arrangements may present a conflict of interest depending on the fee collected by Fortitude. In order to help mitigate this conflict, Fortitude institutes several policies. First, Fortitude has a documented and measurable process for vetting Third-Party Money Managers before they can be added as an investment option and for ongoing review to determine if they should remain an investment option. The amount of compensation received by Fortitude is not a part of the decision making process. Additionally, Financial Advisors do not receive any more or less compensation based on which Third-Party Money Managers they recommend or select. Last, Fortitude requires the delivery of this disclosure document to all advisory clients, prior to or at the time they enter into an advisory agreement with the firm.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

As a fiduciary, Fortitude has established a Code of Ethics with which all of the firm's employees and Financial Advisors must comply. Fortitude accepts its fiduciary responsibility to (1) place the interests of its clients first at all times, (2) act with the utmost good faith (3) provide full and fair disclosure of all material facts and conflicts of interest to clients, and (4) conduct all personal securities transactions consistent with its Code of Ethics. Fortitude's Financial advisors are held to a professional standard that requires they avoid any abuse of an individual's position of trust and responsibility, not take inappropriate advantage of their positions; comply with applicable securities laws and regulations; and maintain confidentiality of client's financial circumstances. You may request a full copy of our Code of Ethics from your Financial Advisor.

Personal Trading

From time to time, Financial Advisors, or related persons, will invest in the same securities that are going to be, or have already been, bought or sold for clients' accounts. Transactions for the Financial Advisor, or a related person, could be effected at or about the same time they are affected for a client's account. Because of this, a conflict of interest could arise in that it is possible for the Financial Advisor, or a related person, to place their order ahead of a client's order. While Fortitude does allow its Financial Advisors to invest in these securities, it does not allow orders to be placed ahead of clients. Placing the client's order ahead of the Financial Advisor's or the related person's does not ensure a better price, however, it does ensure that the client's trade will occur at or before

that of the Financial Advisor or related person.

REVIEW OF ACCOUNTS

Your Financial Advisor is responsible to ensure that the recommended advisory service clients are subscribed to is suitable for the client. Our advisory offerings are managed to meet a wide range of risk tolerances, so indicating an appropriate risk level or risk tolerance for the account and services is an important step in the account review process. Upon opening an account with Fortitude, the Financial Advisor will gather pertinent information in order to help him or her assess the client's risk tolerance and help establish investment goals. Subsequently, and at least annually, a client's Financial Advisor should meet with the client to re-assess the client's situation and make sure nothing has changed that would require an adjustment to the portfolio strategy. This assessment, at a minimum, will include a review of the client's established investment objectives and financial situation, as well as an inquiry as to whether the client would like to include any restrictions on management of your account.

The account custodian provides clients with account statements at least quarterly, which will show account holdings, securities valuations and any trading activity that occurred during the statement period. Upon request, the Financial Advisor may also provide certain account holdings, trading and performance reporting. All securities valuations are done by the custodian or directly from the product sponsor. Fortitude does not provide valuations on securities.

CLIENT REFERRALS AND OTHER COMPENSATION

From time to time, Fortitude may pay a referral fee to a person or to another investment advisory firm for a client referral under Rule 206(4)-3 of the Advisers Act. The referring party must enter into a Solicitor's Agreement with Fortitude and clients who are introduced under this arrangement receive a Solicitor's Disclosure Statement. The Solicitor's Disclosure Statement provides certain information to the introduced client, including but not limited to, the fact that the solicitor/introducer is receiving compensation, the nature of the compensation being received and whether or not the introduced client is paying any more or less for advisory services because of this referral fee arrangement.