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Form ADV Part 2A
Firm Brochure
March 31, 2021

This Brochure provides information about the qualifications and business practices of Auto Pilot. If you have any questions about the contents of this Brochure, please contact our Chief Compliance Officer at josh@strittmatterwealth.com. 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.

Auto Pilot is a registered investment advisory firm. Registration of an investment advisory firm does not imply a particular level of skill or training.

Additional information about Auto Pilot is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of our Firm Brochure. This Item discusses only specific material changes that are made to this brochure and provides our clients with a summary of such changes.

Material Changes since the Last Update

Since the last amendment filed on August 10, 2020, there were no material changes made to the brochure.

Full Brochure and Additional Information

Full Brochure and additional information about Auto Pilot are available via the SEC's website www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with us who are registered or are required to be registered as investment adviser representatives ("IAR").

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Advisory Business

Firm Information

SWMG, LLC dba Auto Pilot (“Auto Pilot,” “we,” “us,” “our”), a limited liability company formed in 2012, is a registered investment advisory firm located in Fort Worth, Texas.

Principal Owners

Auto Pilot is owned and controlled by Josh Strittmatter, its President and CEO. Mr. Strittmatter also services as the Chief Compliance Officer.

Automated Advisory Services

Automated Investment Management Services:

Auto Pilot provides web-based interactive investment advice through its online portal at autopilotinvest.com. This service is provided through Betterment for Advisors. The automated online platform guides clients through the entire investment management process and provides management services.

As part of the automated investment management service, clients will complete an online personal risk tolerance assessment and provide additional information about their financial goals. Based on this information, the appropriate portfolio is selected for each client. These portfolios will be comprised of investments that may include exchange-traded funds (ETFs), mutual funds, and other similar equity-related index funds, stocks, or investment products tailored to the client’s specific needs. Clients can submit or modify risk preferences, investment objectives, investment size, and any other reasonable restrictions for their account(s) directly through the online platform. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty in managing the account. Portfolios will be periodically rebalanced based upon your needs, stated goals, and objectives.

Betterment for Advisors is a digital wealth management platform generally serving independent investment advisory firms. Betterment LLC (“Betterment”), a registered investment advisor, serves as sub-advisor to Auto Pilot clients (“Clients”) utilizing the automated investment management services. MTG LLC, dba Betterment Securities (“Betterment Securities”), a registered broker-dealer and member of FINRA and the SIPC, serves as broker-dealer and custodian.

The services provided by Betterment include:

- **Goal-Based Investment Management:** Betterment’s goal-based investment platform allows advisors and Clients to identify multiple investment goals for each Client, each with specific portfolio allocations;
- **Portfolio Construction Tools:** Advisors and Clients have access to a set of portfolio strategies, each of which is comprised of low-cost, index-tracking exchange-traded funds or mutual funds (the latter only for advisors who are approved to construct portfolios with Dimensional Fund Advisors mutual funds), and are able to customize the risk-level for each investment goal;

- **Automated Investment Management Services:** Betterment's algorithms automate back-office tasks such as trading, portfolio management, tax-loss harvesting, and account rebalancing;
- **Website and Mobile Application:** Betterment's website and mobile application provide a platform for account access and monitoring, and delivery of account documentation and notices; and
- **Advisor Dashboard:** Advisors have access to a dashboard for purposes of monitoring and managing Client accounts.

Other Investment Advisory Services

Auto Pilot provides additional investment advisory services, including financial planning and consulting, investment management, tax overlay programs, and educational seminars and workshops. For additional information regarding these services and their corresponding fees, please request SWMG's other disclosure brochure on Form ADV Part 2A.

Wrap Fee Programs

Auto Pilot does not manage wrap fee programs.

Assets under Management

As of December 31, 2020, SWMG manages \$158,853,913 on a discretionary basis only.

ITEM 5

Fees and Compensation

Fee Billing & Payment

Auto Pilot is compensated for providing automated investment management services by charging an annual management fee based on the assets under management. The total annual advisory fee is 0.70% of the assets managed. Our portion of the fee is 0.50%, and Betterment's fee is 0.20%. The total annual advisory fee is prorated and charged quarterly in arrears based on the Client's average daily balance for the prior quarter, multiplied by 0.70%. Betterment will collect both its and our fee from each Client and remit our portion of the fee directly to Auto Pilot when in receipt of your written authorization by executing an investment advisory agreement permitting the fees to be paid directly from your account. This fee is negotiable, depending upon the circumstances. Betterment charges our Clients an asset-based wrap fee on amounts invested via the Betterment for Advisors platform that is tiered based on the aggregate balance of all of our client accounts at Betterment (not including funds held in Betterment Everyday Cash Reserve). The services included for the wrap fee include all of the services provided by Betterment and Betterment Securities through the Betterment for Advisors platform, including advisory services, custody of assets, execution and clearing of transactions, and account reporting. Betterment collects wrap fees directly from Clients pursuant to the terms of the sub-advisory agreement between Betterment and each Client. Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the advisory, custodial, trade execution, and other services were purchased separately. Our clients on this pricing structure typically also pay a fixed monthly fee to Betterment.

Additional information regarding Betterment's fees and compensation is described in Betterment's Form ADV Part 2A.

You are responsible for all third-party fees (i.e., custodian fees, mutual fund fees, transaction fees, etc.). These fees are separate and distinct from the fees and expenses charged by Auto Pilot.

Termination of Agreement

Auto Pilot's services will automatically renew annually unless terminated by either you or Auto Pilot. Either party may terminate the agreement prior to delivery of the plan or completion of the services with 30-day advance written notice. Upon termination of any service, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable up to and including the effective date of termination.

Notwithstanding the above, if we do not deliver the appropriate disclosure statement to you at least 48 hours prior to you entering into any written or oral advisory contract with this us, then you have the right to terminate the contract without penalty within five (5) business days after entering into the contract.

Other Expenses and Fees

The fees discussed above include payment solely for our asset management services provided by us through our online portal and are separate to certain fees or charges that are imposed by third parties in connection with investments made on your behalf for your account. Third-party fees may include markdowns, markups, brokerage commissions, other transaction costs, and/or custodial fees.

Also, all fees paid to us for automated investment management services are separate from the expenses charged by exchange-traded funds and mutual funds to their shareholders. These fees and expenses will be used to pay management fees for the funds, other fund expenses, account administration, and a possible distribution fee. Exchanged traded funds and mutual funds can be invested in directly by you without our services. However, you would not receive our services to assist you in determining which products or services are most suitable for your financial situation and objectives. You should review both the fees we charge and the fees charged by the fund(s) to understand the total fees to be paid fully.

Furthermore, our IARs are also insurance agents licensed to sell insurance products. If clients purchase these products through us, we receive the normal commissions; thus, a conflict of interest exists between our interests and those of advisory clients. We do not require your IAR to encourage you to implement investment advice using any insurance product recommendations. You are free to implement insurance product recommendations through any insurance agency you may select.

We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose to you that they may purchase recommended products from other representatives not affiliated with us.

ITEM 6

Performance-Based Fees

We do not charge any performance-based fees, which are fees based on a share of capital gains on or capital appreciation of your assets.

ITEM 7

Types of Clients Description

We provide our investment advisory services to:

- Individuals including trusts, estates, 401(k)s, and IRAs of a household
- High net worth individuals

A minimum account size requirement is not required for online asset management services.

ITEM 8

Methods of Analysis, Investment Strategies, and Risk of Loss

Methods of Analysis

We use various methods of analysis and investment strategies. For our automated advisory service, the investment strategies used will vary depending on the client's financial goals and risk tolerances.

Fundamental Analysis – We evaluate economic and financial factors to determine if a security may be underpriced, overpriced, or fairly priced. This method entails assessing a security by attempting to determine its intrinsic value by examining related financial, economic, and other qualitative and quantitative factors. Fundamental analysis requires an in-depth look at all factors that can affect the security's value, from macroeconomic factors (like the overall economy and industry conditions) to individually specific factors (like the financial situation and management of companies). The overall objective of performing the fundamental analysis is to determine a value that an investor can use to determine what sort of position to take with that security. This method of security analysis is contrary to technical analysis. Fundamental analysis involves using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

Technical Analysis – This method involves the evaluation of securities by performing an analysis of static information that is generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value but instead use charts and other tools to determine the patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Modern Portfolio Theory - Modern portfolio theory (MPT) is a risk-averse theory that involves the construction of portfolios to maximize and optimize expected return based on a given level of market risk, emphasizing that risk is an inherent part of higher reward. According to the theory, it's possible to construct an "efficient frontier" of optimal portfolios offering the maximum possible expected return for a given level of risk.

Investment Strategies

When formulating investment advice or managing your assets, we will use a variety of strategies, including:

- Strategic Asset Allocation
- Constant-Weighting Asset Allocation
- Tactical Asset Allocation
- Dynamic Asset Allocation Strategy
- Long/Short Investment Strategy

Your accounts are managed separately with your underlying investment strategies, restrictions, or investment limitations defined within the investment management agreement.

Potential Risks

Investing involves different levels of risk that can result in the loss of any profits and/or principal you have not realized. We manage your account in a manner consistent with your pre-determined risk tolerance and suitability profile. However, we cannot guarantee that our efforts will be successful. Investing in securities involves the risk of loss clients should be prepared to bear.

Investing involves the assumption of risk, including:

Financial Risk: which is the risk that the companies we recommend to you perform poorly, which affect the price of your investment.

Market Risk: which is the risk that the stock market will decline, decreasing the value of the securities we recommend to you with it.

Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.

Political and Governmental Risk: which is the risk that the value of your investment will be affected by the introduction of new laws or regulations.

Interest Rate Risk: which is the risk that the value of the investments we recommend to you will fall if interest rates rise.

Call Risk: which is the risk that your investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.

Credit Risk: which is the risk that the issuer of the bond will default on all or part of their interest and principal obligations.

Default Risk: which is the risk that the issuer is unable to pay the contractual interest or principal on the investment promptly or at all.

Manager Risk: which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.

Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.

High-Yield Corporate Debt Securities: Risks include interest-rate risk and credit risk, as described above.

ITEM 9

Disciplinary Information

Regulatory and Disciplinary

As of the date of this brochure, we have not been subject to any disciplinary, legal, or regulatory events related to past or present investment clients. There has been no disciplinary, legal, or regulatory events related to us or any of our management persons.

ITEM 10

Other Financial Activities and Affiliations

Financial Industry Activities

Neither Auto Pilot nor its management persons are registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

Neither Auto Pilot nor its management persons are registered or as an application pending to register as a futures commission merchant, commodity pool operator, or commodity trading advisor.

Affiliations

SWMG is affiliated with an insurance company in that SWMG's President and CEO, Josh Strittmatter, is the sole owner of both SWMG and Strittmatter Insurance Agency, LLC. The firm's IARs are also insurance agents licensed to sell insurance products. These IARs may recommend insurance products to you through the affiliated insurance company and receive additional compensation from the sale of insurance products. The receipt of additional compensation for the sale of insurance products creates a conflict of interest. SWMG does not require your IAR to encourage you to implement investment advice through our affiliated insurance product recommendations or through our affiliated insurance company. You are free to implement insurance product recommendations through any insurance agency or company you may select. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose to you that they may purchase recommended products from other representatives not affiliated with us or our affiliated insurance company.

We take the following additional steps to address any conflicts of interests:

- We review and document the client's financial background, including investment objectives, risk tolerance, and financial goals;
- Our management team conducts regular reviews of each client account to verify that all recommendations made to a client account to verify that recommendations are suitable based on their investor profile;

SWMG is affiliated with a real estate investment firm in that SWMG's President and CEO, Josh Strittmatter, is the sole owner of both SWMG and My Real Estate Retirement, LLC. My Real Estate Retirement, LLC is a real estate investment firm focused on investing in and managing real estate portfolios for investors who want to diversify their retirement portfolio in residential rental properties. My Real Estate Retirement, LLC clients own the properties and, therefore, directly benefit from leveraging and the tax benefits while My Real Estate Retirement, LLC manages all aspects of the buying, selling, and management process. The IARs may recommend services offered by My Real Estate Retirement, LLC, and receive additional compensation. The receipt of additional compensation for My Real Estate Retirement, LLC services creates a conflict of interest. SWMG does not require your IAR to encourage you to implement advice offered through our affiliation with My Real Estate Retirement, LLC. You are free to implement recommendations through any company you

may select. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose to you that they may utilize services from other representatives not affiliated with us or My Real Estate Retirement, LLC.

Selection of Other Investment Advisers

As indicated in Item 4, our online asset management services are offered through a third-party investment adviser, Betterment.

As part of our relationship with Betterment and Betterment Securities, Betterment may offer us services intended to help us manage and further develop our business enterprise, such as access to webinars and advice about using the Betterment for Advisors platform to grow our business. Betterment may offer different or expanded services in the future. These services could create an incentive for us to recommend that our Clients invest through the Betterment for Advisors platform. This is a potential conflict given that our interest in recommending Betterment could be influenced by our receipt of Betterment's and Betterment Securities' services to our business. Other potential conflicts may exist regarding our use of the Betterment for Advisors platform.

ITEM 11

Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics

Auto Pilot has developed a code of ethics that will apply to all of our supervised persons. We and our IARs must act in a fiduciary capacity when providing investment advisory services to you and all of our clients. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. This fiduciary duty is considered the core underlying principle of our code of ethics, which also covers our insider trading and personal securities transaction policies and procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will acknowledge that they have read, understand, and agree to comply with our Code of Ethics.

Our Code of Ethics is available to clients and prospective clients upon request.

Recommendations Involving a Material Financial Interest

Neither we nor any related person recommend to clients or buys or sells for clients' accounts securities in which we or a related person has a material financial interest.

Participation or Interest in Client Transactions

There may be instances where an Auto Pilot and/or its representatives will recommend to investment advisory clients or prospective clients the purchase or sale of securities in which Auto Pilot, the representative, its affiliates, or other clients may also have a position or interest. Certain affiliated accounts may trade in the same securities with client accounts on

an aggregated basis. Generally, in such circumstances, the affiliated and client accounts will share execution costs equally. Completed trade orders will be allocated according to the instructions from the initial trade order. Partially filled trade orders will be allocated on a pro-rata basis. Any exceptions will be explained in the trade order.

Personal Trading

Employees are permitted to have personal securities accounts as long as personal investing practices are in line with fiduciary standards and regulatory requirements and do not conflict with their duty to Auto Pilot and our clients. Auto Pilot monitors and controls personal trading through pre-approval of all personal securities transactions or blackout periods imposed upon employees trading in the same securities as Auto Pilot. We forbid any officer or employee, either personally or on behalf of others, to trade on material, nonpublic information, or to communicate such information to others in violation of the law.

ITEM 12

Brokerage Practices

Our policies and procedures prohibit unfair trading practices and to avoid conflicts of interest, where possible, or to disclose conflicts when they arise. We will attempt to resolve conflicts when reasonably possible.

Auto Pilot currently has arrangements with Betterment Securities, member SIPC, an unaffiliated SEC-registered broker-dealer, and FINRA member, whereby Auto Pilot requires its investment management clients utilizing its online portal to utilize Betterment Securities for their accounts. Betterment Securities is responsible for the execution of securities transactions and maintains custody of customer assets. Betterment Securities exercises no discretion in determining if and when trades are placed; it places trades only at the direction of Betterment. Clients should understand that the appointment of Betterment Securities as the broker for their accounts held at Betterment may result in their receiving less favorable trade executions than may be available through the use of broker-dealers that are not affiliated with Betterment.

We do not receive client referrals from broker/dealers.

We do not recommend, request, require, or permit clients to direct us to executed transactions through a specific broker-dealer other than those we recommend.

We attempt to allocate trade executions in the most equitable manner possible, taking into consideration current asset allocation and availability of funds using price averaging, proration, and consistently non-arbitrary methods of allocation. We may aggregate orders in order to obtain the best execution, to negotiate more favorable commission rates, or to allocate equitably among our clients' differences in prices and commission or other transaction costs. In aggregated orders, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

Additional information regarding Betterment Securities can be found on FINRA's BrokerCheck.

ITEM 13

Review of Accounts

Periodic Reviews

Clients will be provided with continuous access to their accounts via our online portal. Through the portal, clients will receive current reporting information about their account status, securities positions, and balances. The Chief Compliance Officer will provide reviews of accounts on a periodic, as-needed basis but no less than annually.

Review Triggers

We conduct periodic reviews to evaluate the current market, economic and political events and how these may affect client accounts. Additional reviews may be triggered by these events or by events in the client's financial or personal status.

Regular Reports

Clients utilizing our automated investment management services will receive advisory account reports no less than quarterly. These reports show asset value by cash balances, security, unit cost, total cost, current per share values, etc. Clients are urged to review the quarterly reports provided by us with those provided by their custodian and notify us of any differences. Clients are encouraged to phone or email us as often as they deem necessary to receive information regarding the investment tactics and strategies being followed.

ITEM 14

Client Referrals and Other Compensation

We may occasionally pay a referral fee to third-party solicitors. However, no fee is paid unless we have a signed solicitor agreement. All solicitors who refer clients to us must be in compliance with the requirements of the jurisdiction in which they operate and must be appropriately licensed to perform such services. You must sign a disclosure form that contains the details of the referral agreement. Our fiduciary duties still apply to referral relationships, and we must put the interest of our clients first and see the best execution of securities transactions on behalf of our clients.

When considering what client referrals and other compensation to disclose, please keep in mind that you may be deemed to give Betterment an indirect benefit in the form of the asset-based fees it receives from your Clients. You also receive a non-economic benefit from Betterment in the form of the support products and services it makes available to you.

Please see Item 12 Brokerage Practices for information regarding the benefits we receive from our custodian.

ITEM 15

Custody

We are deemed to have custody of client funds and securities due to our ability to deduct management fees from clients' accounts. We will not take physical custody of clients' funds and will not assign or transfer trading authorization to another advisor. Betterment Securities maintains custody of clients' assets that are managed by Betterment Clients' account statements are available for review on the activity section of the Betterment for Advisors client portal. Clients receive periodic emails from Betterment with information about their accounts as well as links to account statements. Clients are encouraged to

carefully review those statements promptly for accuracy. The custodian's account statements will indicate the amount of our advisory fees deducted from the clients' account(s) each billing period. Item 5 – Fees and Compensation has additional information regarding our ability to deduct management fees from clients' accounts.

ITEM 16

Investment Discretion

Discretionary Authority for Trading

We provide our investment management services on both a discretionary and non-discretionary basis. If you are participating in our discretionary investment management services, upon receiving your written authorization via our executed investment advisory agreement, we will maintain trading authorization over your designated account and may also implement trades on a discretionary basis.

When discretionary authority is granted, we will have the limited authority to determine the type of securities to be purchased, sold, or exchanged and a number of securities that can be bought, sold, or exchanged for your portfolio without obtaining your consent for each transaction.

On a case-by-case basis, you may place reasonable restrictions on the types of investments that may be purchased or sold in your account so long as the restrictions are explicitly set forth or included as an attachment to the investment advisory agreement.

Betterment uses algorithms to advise clients and manage their accounts. These algorithms are developed, overseen, and monitored by Betterment's investment advisory personnel. To use Betterment's investment services, Clients and/or Auto Pilot inform Betterment of a Client's financial goals and personal information through Betterment's online applications, and Betterment's algorithm then recommends and builds a portfolio of exchange-traded funds for each of the client's financial goals and account types. Each portfolio is associated with a target allocation of investment types and/or asset classes, but we can modify Betterment's initial allocation recommendation as we see fit.

In the absence of a contrary direction, Betterment periodically rebalances client portfolios so that in the face of fluctuating market prices, each Client's portfolio remains within a range of the target allocation. Betterment also offers optional tax-loss harvesting and automated asset location services.

ITEM 17

Voting Client Securities

For assets managed on the Betterment for Advisors platform, clients delegate to Betterment the authority to receive and vote all proxies and related materials. Betterment will only vote on proxies and respond to corporate actions associated with securities that Betterment recommends be purchased for client accounts. Additional information about proxy matters is contained in Betterment's Form ADV Part 2A.

We do not have the authority to vote proxies as it pertains to the issuers of securities held in your account. The responsibility for voting your securities places increased liability to us and does not add enough value to the services provided to you to justify the additional compliance

and regulatory costs associated with voting your securities. Although we do not vote your proxies, you can contact us if you have a question about a particular proxy.

ITEM 18

Financial Information

We are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

We are currently not in, nor have been historically in a financially precarious situation or the subject of a bankruptcy petition.