

For Your Records Only - No Signature Required

Schwallier Wealth Management LLC

Form ADV Part 2A Summary

Disclosure Brochure

Dated: September 23, 2021

www.swmadvisor.com

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This Brochure provides information about the qualifications and business practices of Schwallier Wealth Management LLC [“SWM”]. If you have any questions about the contents of this Brochure, please contact SWM at (616) 855-2051 or adam@swmadvisor.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.

Additional information about SWM is also available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by using a unique identifying number known as the CRD Number. Our CRD# is 143329.

Please note that the use of the term “registered investment adviser” and description of SWM and/or our associates as “registered” does not imply a certain level of skill or training. You are encouraged to review this Brochure and the Brochure Supplements for our firm’s associates who advise you for more information on the qualifications of our firm and our employees.

Item 2 - Material Changes

Since its last update (June 15, 2021), SWM has applied and been approved for registration with the SEC as a Registered Investment Advisor. By rule, SWM must withdraw from the individual state registrations in Michigan and Indiana once approved for registration with the SEC.

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Item 4 – Advisory Business

SWM is an independent, fee-only registered investment adviser providing investment advisory services to both individuals and company sponsored retirement plans. To best serve clients, SWM is committed to minimizing potential conflicts of interest and providing transparent pricing.

SWM has been in business since 2007 and is privately owned by Adam Schwallier (100%).

As of September 21, 2021, SWM had \$128,868,368 of assets under management, of which \$118,101,290 was managed on a discretionary basis and \$10,767,079 was managed on a non-discretionary basis.

Prior to engaging SWM to provide any of the foregoing investment advisory or financial planning services, the client is required to enter into one or more written agreements with SWM setting forth the terms and conditions under which SWM renders its services (collectively the “Agreement”).

This Disclosure Brochure describes the business of SWM. Certain sections will also describe the activities of Supervised Persons. Supervised Persons are any of SWM’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on SWM’s behalf and is subject to SWM’s supervision or control.

Investment Management Services

Clients may engage SWM to manage all or a portion of their investment portfolios on a discretionary basis. SWM will assist clients in determining their investment objectives, risk tolerance, and cash flow needs before constructing an appropriate investment portfolio. SWM may also provide clients with financial planning services as a part of its investment management services. SWM does not participate in wrap fee programs.

SWM primarily allocates client assets among various investments, with a strong bias for low-fee, tax advantaged investments typically embodied through a passive approach to the markets. However, where certain opportunities present themselves or SWM believes that a manager has an unusual advantage in a marketplace; SWM may suggest and employ other strategies. These strategies may include mutual funds, exchange-traded funds (“ETFs”), or other listed securities, in accordance with the investment objectives of its individual clients. Where appropriate, SWM may also provide advice about client-selected securities, legacy positions, or other investments held in client portfolios.

SWM may, in special circumstances, offer our clients the services of unaffiliated third-party asset management providers [“TAMP”]. We have entered into a master agreement with each TAMP that governs our relationship with the TAMP with respect to our clients. Under a TAMP program, we will develop an overall asset allocation mix for a client and then implement the strategy using managers prescreened by the TAMP and/or managers that we have screened ourselves. The TAMP provides account reports on a periodic basis, and we review those reports with the clients to evaluate performance and discuss strategy

SWM may render discretionary or non-discretionary investment management services to clients relative to variable life/annuity products that they may own, their individual employer-sponsored retirement plans, and/or 529 plans or other products that may not be held by the client’s primary custodian. In so doing, SWM either directs or recommends the allocation of client assets among the various investment options that are available with the product. Client assets are maintained at the specific insurance company or custodian designated by the product.

Although SWM does have certain investment strategies that it seeks to execute for all of its clients, SWM will tailor its advisory services to the individual needs and preferences of each client. SWM’s investment advisory services have been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs, with a

non-exclusive safe harbor from the definition of an investment company. In accordance with Rule 3a-4, the following disclosure is specifically applicable to SWM's management of client assets:

1. Initial Interview – at the opening of the account, SWM, through its designated representatives, shall obtain from the client information sufficient to determine the client's financial situation, investment objectives, and any reasonable restrictions;
2. Individual Treatment – the client's account is managed on the basis of the client's financial situation, investment objectives, and in accordance with any reasonable restrictions imposed by the client;
3. Quarterly Notice – on client's quarterly statement, SWM shall ask each client to advise SWM whether or not the client's financial situation or investment objectives have changed, or if the client would like to impose and/or modify any reasonable restrictions on the management of the client's account;
4. Annual Contact – at least annually, SWM shall attempt to contact the client to determine whether the client's financial situation or investment objectives have changed, or if the client would like to impose and/or modify any reasonable restrictions on the management of the client's account.
5. Consultation Available – SWM shall be reasonably available to consult with the client regarding the status of the client's account;
6. Quarterly Statement – each client shall be provided with a quarterly performance report.
7. Ability to Impose Restrictions – the client shall have the ability to impose reasonable restrictions on the management of the account, including the ability to instruct SWM not to purchase certain investments; and,
8. Ownership – each client retains indicia of ownership of the account (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

Financial Planning and Consulting

SWM makes financial planning and consulting available to its investment management clients for no additional cost. This service provides guidance in the areas of retirement planning, estate planning, education funding, tax planning, cash flow analysis, and Social Security maximization.

Individuals, who are not investment management clients, may engage with SWM on an hourly basis or a flat-fee-per-engagement basis for financial planning and consulting services.

Company Sponsored Retirement Plans

SWM also specializes in providing investment advisory services to company sponsored retirement plans. Advisory services provided are in the nature of research, analysis, and selection of investment alternatives. SWM may manage a plan's assets on a discretionary or nondiscretionary basis. SWM's services also include participant education and enrollment. SWM typically does not make specific investment recommendations to plan participants. However, participants may contract directly with SWM for investment advisory services.

Item 5 – Fees and Compensation

Investment Management Fees

SWM provides investment management services for an annual fee based upon a percentage of the market value of the assets being managed by SWM. SWM's annual fee is negotiated as a percentage of assets under management, not to exceed an annualized fee of 1.0%. SWM, in its sole discretion, may decrease its annual minimum fee and/or charge a lesser management fee. SWM's annual fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses which are incurred by the client. SWM does not, however, receive any portion of these commissions, fees, and costs. Item 12 further describes the factors that SWM considers in recommending broker-dealers for client transactions and determining the reasonableness of their

compensation (e.g., commissions). SWM's annual fee is prorated and charged quarterly, in arrears for clients on the TDA Institutional platform and in advance for clients on the LPL platform, based upon the market value of the assets being managed by SWM on the last day of the most recent quarter. SWM deducts the fee from the client's account unless the client specifically requests the fee to be direct billed. If investment management services are terminated for clients billed in arrears, earned fees unpaid will be ratably charged and immediately due. That fee is calculated based on the number of days that assets were under management in the quarter as a percentage of the number of total days in the quarter times the market value as of the last day of management. If investment management services are terminated for clients billed in advance, unearned fees paid in advance will be ratably refunded upon request of the client. That refund is calculated based on the number of day remaining in the quarter as a percentage of the number of total days in the quarter time the fee charged. Clients may terminate the Advisory relationship during the first 5 days at no cost.

Financial Planning and Consulting Fees

For individuals who are not investment management clients, SWM may agree to provide financial planning and consulting services charged at an hourly rate or by a flat fee per engagement based upon the work to be done, the extent and complexity of the individual client's personal circumstances, and the client's gross income. Fees for specific financial planning and consulting services will be billed at an hourly rate of \$250 per hour and shall be due and payable as earned. Flat fees per engagement for financial planning and consulting services will typically range from \$500 to \$2,000, with no minimum fee. The fee will be due and payable at the time the financial plan/recommendation is delivered to the client.

Item 6 – Performance-Based Fees and Side-By-Side Management

SWM does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

SWM provides portfolio management services to individuals, high net worth individuals, corporations/businesses, and corporate pension and profit-sharing plans.

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

Methods of Analysis and Investment Strategies

SWM assists clients with long-term investment plans that are guided by documented client goals, constraints and risk profiles. To this end, SWM makes initial investment recommendations only after thoroughly analyzing each new client's risk tolerance, goals and financial situation. Once SWM has established an appropriate investment portfolio for a new client based on these guiding factors, SWM then meets or interacts with each client at least annually to review any changes to their situation that may require adjustments to their investment portfolio.

To manage investment risk, SWM uses a range of strategic asset allocation models for various investor time horizons, risk profiles and investment objectives. SWM uses these models as a starting point to develop asset allocation strategies that are tailored to the unique needs of each client.

To widely diversify investments, SWM uses asset allocation models that employ multiple asset classes, and typically recommends only well-diversified mutual funds and exchange-traded funds as investment options within these asset classes.

To optimize investment performance, SWM pursues the following three strategies:

1) SWM seeks to select sound and well-performing investments (i.e., mutual funds, exchange-traded

funds, etc.) in each asset class it utilizes. To this end, SWM uses a disciplined investment review process that employs both internal and externally-purchased investment screening methodologies and tools to assess investments on both quantitative and qualitative factors. Some examples of screening criteria used include: i) level of regulatory oversight, ii) historical investment performance relative to appropriate benchmarks and peer group, iii) size of fund in terms of total assets managed., iv) stability of the organization, v) investing style and history relative to asset class and stated investment objectives, vi) expense ratio and/or fees relative to peer group, and vii) investment manager tenure.

Once SWM selects investments to recommend to clients, it monitors performance of these investments at least quarterly to ensure they continue to perform satisfactorily relative to the original qualitative and quantitative screens used to initially select them.

2) SWM periodically rebalances client portfolios back to their target asset allocation to methodically capture gains in well-performing asset classes and take advantage of depressed values in assets classes that may be temporarily out of favor.

3) SWM monitors each client's overall investment performance at least quarterly by producing comprehensive performance reports showing each client's entire investment portfolio so appropriate adjustments can be made, as needed.

SWM does not attempt to actively time investment purchases or sales (i.e., market timing) as a method to boost investment performance.

Risks

It should be noted that all investments are subject to inherent risks, and investments in the portfolios managed by SWM are no exception. Accordingly, you may lose money when investing with SWM. Portfolios utilizing each of SWM's strategies will fluctuate, reflecting day-to-day changes in market conditions, interest rates and numerous other factors. It is possible, even in SWM's conservative strategy, that a client will lose money. Investing in securities involves risk of loss that client should be prepared to bear.

Item 9 – Disciplinary Information

SWM is required to disclose the facts of any legal or disciplinary events (these include any criminal or civil action, and administrative or self-regulatory proceedings) that are material to a client's evaluation of its advisory business or the integrity of management. SWM does not have any required disclosures to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

SWM's Management and SWM's Supervised Persons also operate a separate investment advisor, Mosaic Investment Advisors LLC, registered in the state of Michigan. SWM's Management and SWM's Supervised Persons do not have a relationship or arrangement with any issuer of securities.

Item 11 – Code of Ethics

SWM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at SWM must acknowledge the terms of the Code of Ethics annually, or as amended.

SWM anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which SWM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which SWM, its affiliates and/or clients, directly or indirectly, have a position of interest. SWM's employees and persons associated with SWM are required to follow SWM's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of SWM and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for SWM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of SWM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

SWM's recommendations do not generally have the potential for a conflict of interest arising from recommendation of securities traded in an active market. Any purchase or sale of such securities by SWM consultants should not alter the price of the investment as sold by the issuer. Such securities or investment products may be publicly traded, not publicly traded, or insurance.

SWM has implemented an investment policy relative to personal securities transactions. This investment policy is part of SWM's overall Code of Ethics which serves to establish a standard of business conduct for all of SWM's Access Persons that is based upon fundamental principles of openness, integrity, honesty and trust. All Access Persons are required to report personal securities transactions as these are monitored by the Chief Compliance Officer to ensure compliance with SWM's Code of Ethics.

SWM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Adam Schwallier.

Item 12 – Brokerage Practices

The Custodian and Broker SWM Uses

SWM does not maintain custody of the client assets they manage; although SWM may be deemed to have custody of client assets if the client gives SWM authority to withdraw assets from the client's account (see Item 15 – Custody, below). Client assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. Each SWM client reserves the right to direct brokerage/custodian business to any financial institution of choice (subject to SWM's right to decline or terminate the engagement). SWM recommends that its clients use TD Ameritrade or LPL Financial (together "Preferred Custodians") as the qualified custodian. TD Ameritrade ("TDA") and LPL Financial ("LPL") are registered brokers/dealers and members of SIPC. SWM is independently owned and operated and is not affiliated with the Preferred Custodians. The Preferred Custodians hold client assets in brokerage accounts and buy and sell securities when SWM/client instruct them to do so. While SWM recommends that clients use the Preferred Custodians, each client decides whether or not to do so and opens an account with the Preferred Custodians by entering into an account agreement directly with the Preferred Custodians. SWM does not open accounts for clients, although SWM may assist clients in doing so. Not all advisors require clients to use a particular broker-dealer or custodian. Although client accounts are maintained at the Preferred Custodians, SWM is able to use other brokers to execute trades for client accounts as described below (see "Client Brokerage and Custody Costs"). If the client directs brokerage to Non-Preferred Custodians, SWM will not be able to negotiate commissions, achieve best execution, aggregate orders to the extent it may have been possible with the Preferred Custodians, and so the client may pay more than they otherwise would have under the circumstances.

TDA Institutional is TDA's business serving independent investment advisory firms like us. Through TDA Institutional, TDA provides us and our clients with access to its institutional brokerage services—

trading, custody, reporting, and related services—many of which are not typically available to TDA retail customers. TDA also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. TDA's support services described below are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to us of TDA's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Here is a more detailed description of TDA's support services:

TDA's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through TDA include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. TDA's services described in this paragraph generally benefit the client and the client's account.

TDA also makes available to us other products and services that benefit us but may not directly benefit the client or its account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both TDA's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at TDA in addition to investment research.

TDA also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

TDA also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

TDA may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. TDA may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. TDA may also provide us with other benefits such as occasional business entertainment of our personnel.

The availability of services from TDA benefits us because we do not have to produce or purchase them. We don't have to pay for these services, and they are not contingent upon us committing any specific amount of business to TDA in trading commissions or assets in custody. In light of our arrangements with TDA, we may have an incentive to recommend that our clients maintain their accounts with TDA based on our interest in receiving TDA's services that benefit our business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. We believe, however, that our selection of TDA as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality, and price of TDA's services and not TDA's services that benefit only us. We have adopted policies and procedures designed to ensure that our use of TDA's services is appropriate for each of our clients.

LPL provides brokerage and custodial services to independent investment advisory firms, including

SWM. For SWM's accounts custodied at LPL, LPL generally is compensated by clients through commissions, trails, or other transaction-based fees for trades that are executed through LPL or that settle into LPL accounts. For IRA accounts, LPL generally charges account maintenance fees. In addition, LPL also charges clients miscellaneous fees and charges, such as account transfer fees. LPL charges SWM an asset-based administration fee for administrative services provided by LPL. Such administration fees are not directly borne by clients but may be taken into account when SWM negotiates its advisory fee with clients.

Clients should also be aware that for accounts where LPL serves as the custodian, SWM is limited to offering services and investment vehicles that are approved by LPL, and may be prohibited from offering services and investment vehicles that may be available through other broker-dealers and custodians.

LPL makes available to SWM various products and services designed to assist SWM in managing and administering client accounts. Many of these products and services may be used to service all or a substantial number of SWM's accounts, including accounts not held with LPL. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); facilitate trade execution (and aggregation and allocation of trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of SWM's fees from its clients' accounts; and assist with back-office functions; recordkeeping and client reporting.

LPL also makes available to SWM other services intended to help SWM manage and further develop its business. These support services and/or products may be provided without cost, at a discount, and/or at a negotiated rate, and include practice management-related publications; consulting services; attendance at conferences and seminars, meetings, and other educational and/or social events; marketing support; and other products and services used by SWM in furtherance of the operation and development of its investment advisory business.

The products and services described above are provided to SWM as part of its overall relationship with LPL. While as a fiduciary SWM endeavors to act in its clients' best interests, the receipt of these benefits creates a conflict of interest because SWM's recommendation that clients custody their assets at LPL is based in part on the benefit to SWM of the availability of the foregoing products and services and not solely on the nature, cost or quality of custody or brokerage services provided by LPL. SWM's receipt of some of these benefits may be based on the amount of advisory assets custodied on the LPL platform.

LPL provides various benefits and payments to advisory firms that are new to the LPL platform to assist them with the costs (including foregone revenues during account transition) associated with transitioning their business to the LPL platform (collectively referred to as "Transition Assistance"). The proceeds of such Transition Assistance payments are intended to be used for a variety of purposes, including but not necessarily limited to, providing working capital to assist in funding the advisor's business, offsetting account transfer fees (ACATs) payable to LPL as a result of the advisor's clients transitioning to LPL's custodial platform, technology set-up fees, marketing and mailing costs, stationary and licensure transfer fees, staffing support and termination fees associated with moving accounts.

The receipt of Transition Assistance creates conflicts of interest relating to SWM's advisory business because it creates a financial incentive for SWM's representatives to recommend that its clients open their accounts with LPL.

SWM attempts to mitigate these conflicts of interest by evaluating and recommending that clients use LPL's services based on the benefits that such services provide to its clients, rather than the Transition Assistance received. However, clients should be aware of this conflict and take it into consideration in making a decision whether to custody their assets in a brokerage account at LPL.

How SWM Evaluates Brokers/Custodians for Recommendation to Clients

SWM seeks to recommend custodian/broker-dealers that hold client assets and execute transactions on terms that are, overall, most advantageous to clients when compared to other available providers. SWM considers a wide range of factors, including, but not limited to:

- Overall quality of custodial services
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of investment products available (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools to assist SWM in making investment decisions
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate when special circumstances dictate.
- Reputation, financial strength, and stability
- Availability of other products and services that benefit SWM, as discussed below (see “Products and Services Available to SWM From Preferred Custodians”)

Client Brokerage and Custody Costs

Preferred Custodians generally do not charge SWM clients separately for custody services but rather receive compensation in the form of trade commissions or other fees it may charge to client accounts.

We may aggregate the purchase and sale of securities for various client accounts. We can purchase and sell the same securities for the accounts of multiple clients at the same time. In such event we enter aggregated orders. Each client pays or receives the average price for the purchase or sale his securities. If we did not aggregate these orders, some clients would receive more favorable prices and other clients would be disadvantaged. Our procedures are designed to treat all clients fairly.

Item 13 – Review of Accounts

For those clients to whom SWM provides investment supervisory services, account reviews are conducted on an ongoing basis by SWM’s Principals and/or Associated Persons. All clients are advised that it remains their responsibility to advise SWM of any changes in their investment objectives and/or financial situation, and impose, modify or add any reasonable restrictions to SWM’s management of their accounts. All clients (in person, through e-mail or telephonically) are encouraged to review their financial planning issues (to the extent that SWM has been engaged to provide financial planning services), investment objectives and account performance with SWM on an annual basis.

Statements of each account are mailed at least quarterly to clients directly by the applicable brokerage firms, mutual funds, trust departments and/or financial institutions. SWM does not take possession of any assets of its clients and therefore does not issue its own statements of accounts to clients. However, as part of its quarterly investment management/advisory billing process, SWM does send to its clients (either directly itself, or through an authorized agent), quarterly performance reports. These reports are either mailed, e-mailed, or placed in an encrypted file online that clients have access to depending on the preference of each client. Reports are sent for informational purposes only, and do not, and should not be relied upon to, serve as a substitute for any reports distributed by either the client’s mutual fund company or any monthly or annual statements sent by the broker/dealer that maintains custody of the client’s account.

Item 14 – Client Referrals and Other Compensation

SWM receives an economic benefit from the Preferred Custodians in the form of support products and

services made available to SWM and other independent investment advisors. These products and services, how they benefit SWM, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability of the Preferred Custodian’s products and services is not based on SWM giving particular investment advice to its clients.

We may pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their contacts to our firm in accordance with Rule 206 (4)-3 for the Investment Advisers Act of 1940. Such referral fees represent a share of our investment advisory fee charged to our clients. This arrangement will not result in higher costs to clients. In this regard, we maintain Solicitors Agreements in compliance with Rule 206 (4)-3 of the Investment Advisers Act of 1940 and applicable state and federal laws.

SWM may enter into referral arrangements with these related companies whereby SWM and a related company will share revenue for referrals. Any referral arrangement, as well as the affiliation of the companies, are fully disclosed to clients in advance, and will not result in higher fees to referred clients for advisory or any other service.

Item 15 – Custody

Under government regulations, SWM is deemed to have custody of your assets if, for example, clients authorize SWM to instruct the Preferred Custodians to deduct SWM advisory fees directly from their account or if they grant SWM authority to move their money to another person’s account. The Preferred Custodians maintain actual custody of their assets. Clients will receive account statements directly from the Preferred Custodians at least quarterly. The statements will be sent to the email or postal mailing address they provided to the Preferred Custodians. Clients should carefully review these statements promptly when they receive them. SWM also urges clients to compare the Preferred Custodian’s account statements to the quarterly performance reports they receive from SWM.

Item 16 – Investment Discretion

SWM advises on equity, fixed income, exchange traded funds, options, annuities and mutual fund investments under written investment management agreements, which includes discretionary authority. Such discretionary authority, together with limited powers of attorney executed by SWM’s clients, allows SWM consultants to determine, without specific client consent, (1) the securities to be purchased or sold and (2) the amount of securities to be bought or sold. Clients may limit or amend SWM’s discretionary authority by making a written request. While there are no other express limitations on the authority described, SWM requires prior written discretionary authority from its clients in the form of a contract.

SWM has clients where it does not have discretionary authority, typically these clients are corporate pension and profit-sharing plans. The individuals participating in these plans can give SWM discretionary authority over their assets inside the plan by signing a contract.

Item 17 – Voting Client Securities

Clients receive proxies from their custodian. SWM does not exercise proxy voting authority over clients’ securities unless a client specifically requests differently. Clients can contact SWM with questions about particular solicitations.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about SWM’s financial condition. SWM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the

subject of a bankruptcy proceeding. Please note that MIA does not charge more than \$500 in fees per client, six months or more in advance.

Privacy Policy Notice

As a registered investment adviser, SWM has a responsibility and fiduciary duty to protect the privacy of client information. SWM must comply with SEC Regulation S-P, which requires registered investment advisers to adopt policies and procedures to protect clients' non-public personal and financial information ("NPFI"). To comply, SWM holds both the firm and its employees to the highest standards of trust and fiduciary duty in the safeguarding and use of clients' NPFI. SWM is committed to maintaining the confidentiality of the information it collects from current, potential and former clients and therefore SWM adheres to the policies and practices described in this notice.

Client Information: In order to provide clients with personalized financial services, SWM requests non-public personal, financial and transactional information. SWM will collect this confidential information from clients directly through conversations, paperwork and correspondence so SWM can compile a full financial picture in order to best serve the client.

Non-Disclosure of Client Information: SWM maintains safeguards to comply with federal and state standards to safeguard each client's NPFI. SWM does not share any NPFI with any nonaffiliated third parties, except in the following circumstances:

- As necessary to provide services the client has requested or authorized, or to maintain and service the client's account;
- As required by regulatory authorities or law enforcement officials who have jurisdiction over SWM, or as otherwise required by an applicable law;
- To protect the confidentiality or security of the financial institution's records against fraud and for institutional risk control purposes; and
- To provide information to the firm's attorneys, accountants and auditors or others determining compliance with industry standards.
- To share name and contact information only with another investment adviser who would provide back-up communication services to assist you with your account in the event of our principal's death or medical disability.

Safeguarding Client Information: SWM restricts access to NPFI to those employees who need to know such information in order to provide services to clients. SWM maintains physical, electronic and procedural safeguards to restrict the access to such information. Employees are prohibited, either during or after termination of employment, from disclosing NPFI to any person or entity outside SWM, including family members, except under the circumstances described above.

SWM's Privacy Policy remains in effect at all times, even after the client relationship is terminated.

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06/14/2021

This document is a supplement to Schwallier Wealth Management's Summary Disclosure Brochure and is intended to provide information specific to Adam Schwallier. If you have not received a copy of SWM's Summary Disclosure Brochure please contact SWM at 616-855-2051. Additional information about Adam Schwallier is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Adam Schwallier, Born 03/30/1973

Education: B.S. in Mathematics of Finance, University of Michigan, 1996

Professional Designations:

CFP® - Certified Financial Planner™

Issued by: Certified Financial Planner Board of Standards, Inc. Prerequisites/Experience Required:

Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP®-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP® Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2-years

Employment:

- President/Investment Advisor Representative, Schwallier Wealth Management LLC (09/2007-Present)
- President/Investment Advisor Representative, Mosaic Planners and Advisors (01/2021-Present)
- Financial Consultant, AG Edwards & Sons, Grand Rapids, MI (08/05-09/07)
- Financial Advisor, Morgan Stanley, Grand Rapids, MI (04/01-08/05)
- Actuarial Associate, Lincoln National Life Insurance Company, Fort Wayne, IN (5/97-04/01)

Item 3-Disciplinary information

Registered Investment Advisers are required to disclose all material facts regarding any criminal or civil action; an administrative or self-regulatory organization proceeding; or any other hearing or formal adjudication regarding a professional attainment, designation, or license that would be material to your evaluation of each supervised person providing investment advice. There is nothing regarding Adam Schwallier that is applicable to this item.

Item 4- Other Business Activities

Adam Schwallier is also an Investment Advisor Representative for Mosaic Investment Advisors LLC, a Registered Investment Advisor.

Item 5- Additional Compensation

None.

Item 6 - Supervision

We supervise Mr. Schwallier's activities. An officer of our firm reviews the accounts managed by Mr. Schwallier. Mr. Schwallier is supervised by Adam Schwallier, President. Mr. Schwallier's telephone number is (616) 855-2051.

Item 7 – Requirements for State-Registered Advisers

Arbitration claims: **None**

Award or found liable in a civil, self-regulatory organization or administrative proceeding: **None**

Bankruptcy Petition: **None**

Emily Joles
Schwallier Wealth Management LLC
4764 Fulton Street East, Suite 201
Ada, MI 49301
616-855-2051
06/14/2021

This document is a supplement to Schwallier Wealth Management's Summary Disclosure Brochure and is intended to provide information specific to Emily Joles. If you have not received a copy of SWM's Summary Disclosure Brochure, please contact SWM at 616-855-2051. Additional information about Emily Joles is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Emily Joles, Born 08/28/1991

Education: B.B.A. in Finance, Grand Valley State University, 2015

Professional Designations:

None.

Employment:

- Investment Advisor Representative, Schwallier Wealth Management LLC (06/2019-Present)
- Investment Advisor Representative, Mosaic Planners and Advisors (01/2021-Present)
- Wealth Advisor Associate, Morgan Stanley, Grand Rapids, MI (03/2018-05/2019)
- Account Manager, Flex Administrators Inc., Grand Rapids, MI (02/2015-03/2018)

Item 3-Disciplinary information

Registered Investment Advisers are required to disclose all material facts regarding any criminal or civil action; an administrative or self-regulatory organization proceeding; or any other hearing or formal adjudication regarding a professional attainment, designation, or license that would be material to your evaluation of each supervised person providing investment advice. There is nothing regarding Emily Joles that is applicable to this item.

Item 4- Other Business Activities

Emily Joles is also an Investment Advisor Representative for Mosaic Investment Advisors LLC, a Registered Investment Advisor.

Item 5- Additional Compensation

None.

Item 6 - Supervision

We supervise Ms. Joles's activities. An officer of our firm reviews the accounts managed by Ms. Joles. Ms. Joles is supervised by Adam Schwallier, President. Mr. Schwallier's telephone number is (616) 855-2051.

Item 7 – Requirements for State-Registered Advisers

Arbitration claims: **None**

Award or found liable in a civil, self-regulatory organization or administrative proceeding: **None**

Bankruptcy Petition: **None**

Mary Kathryn Britenfeld
Schwallier Wealth Management LLC
4764 Fulton Street East, Suite 201
Ada, MI 49301
616-855-2051
06/14/2021

This document is a supplement to Schwallier Wealth Management's Summary Disclosure Brochure and is intended to provide information specific to Mary Kathryn Britenfeld. If you have not received a copy of SWM's Summary Disclosure Brochure, please contact SWM at 616-855-2051. Additional information about Mary Kathryn Britenfeld is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

MK Britenfeld, Born 12/24/1976

Education: M.B.A., University of Notre Dame, 2013

B.A. in International Relations: Latin America, University of Michigan, 1999

Professional Designations:

None.

Employment:

- Investment Advisor Representative, Schwallier Wealth Management LLC (06/2021-Present)
- Investment Advisor Representative, Mosaic Planners and Advisors (06/2021-Present)
- Investment Advisor Representative, True Blue Financial, LLC, Stevensville, MI (12/2020-06/2021)
- Investment Advisor Representative, LPL Financial LLC, Stevensville, MI (02/2020-12/2020)
- Registered Representative, LPL Financial LLC, Stevensville, MI (02/2020-06/2021)

Item 3-Disciplinary information

Registered Investment Advisers are required to disclose all material facts regarding any criminal or civil action; an administrative or self-regulatory organization proceeding; or any other hearing or formal adjudication regarding a professional attainment, designation, or license that would be material to your evaluation of each supervised person providing investment advice. There is nothing regarding Mary Kathryn Britenfeld that is applicable to this item.

Item 4- Other Business Activities

Mary Kathryn Britenfeld is also an Investment Advisor Representative for Mosaic Investment Advisors LLC, a Registered Investment Advisor.

Item 5- Additional Compensation

None.

Item 6 - Supervision

We supervise Ms. Britenfeld's activities. An officer of our firm reviews the accounts managed by Mrs.

Britenfeld. Ms. Britenfeld is supervised by Adam Schwallier, President. Mr. Schwallier's telephone number is (616) 855-2051.

Item 7 – Requirements for State-Registered Advisers

Arbitration claims: **None**

Award or found liable in a civil, self-regulatory organization or administrative proceeding: **None**

Bankruptcy Petition: **None**