

FIRM BROCHURE
Item 1 Cover Page

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December 31, 2021

SEC File Number 801-69316

This brochure provides information about the qualifications and business practices of ETFidea, LLC. If you have any questions about the contents of this brochure, please contact us at 315-472-6221 or by email at wkriesel@etfidea.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 ETFidea, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

We have updated our criteria for accounting for non-discretionary assets under management. Prior to this year, we included all assets that were overseen by an IAR associated with ETFidea even though they were not under a management client agreement. Beginning with this report, we will only include assets under a management agreement.

We have updated our Code of Ethics.

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Item 4 Advisory business

ETFidea was formed on June 13, 2002, and has been providing asset management services since inception.

ETFidea is a wholly owned subsidiary of Diversified Capital Management, LLC. Diversified Capital Management, LLC is a brokerage firm offering its clients traditional brokerage services. The members of Diversified Capital Management, LLC, are also either Registered Principals of Cadaret, Grant & Co., Inc. and / or Members of Bowers & Company CPAs, PLLC. Diversified Capital Management, LLC, Cadaret, Grant & Co., Inc., Bowers & Company, LLC and the Applicant are all separate entities.

ETFidea, through Diversified Capital Management has two principal owners, William Kriesel and Michael D'Avirro. The educational and professional backgrounds for Bill and Mike are as follows:

William T. Kriesel - Born in 1964

B.S. - Accounting from Lemoyne College, Syracuse, NY

11/2007 - Present - Member - B&C Planning Services, LLC

01/2006 - Present - Bower's & Company, CPA's - Partner in the Tax and Financial Planning Department

08/2003 - Present - Member -ETFidea, LLC

08/2003 - Present - Investment Adviser Representative of ETFidea, LLC

10/1999 - Present - Registered Representative with Cadaret, Grant & Co., Inc.

11/1998 - Present - Registered Representative of Diversified Capital Management, LLC

07/1993 - 12/2005 - Partner in charge of Taxation - Grimaldi & Nelkin P.L.L.C

Michael G. D'Avirro – Born in 1960

B.S. – Accounting from SUNY Oswego, Oswego, NY

M.S. – Accounting from Syracuse University

5/1991 – Present – Bower's & Company, CPA's – Managing Partner

10/2015 – Present – Member of Diversified Capital Management, LLC

10/2015 – Present – Member of ETFidea, LLC

ETFidea, LLC is a Registered Investment Advisor with the Securities and Exchange Commission (SEC), and has multiple Investment Advisor Representative (IARs). ETFidea, LLC provides a variety of advisory services including, but not limited to, investment supervisory services, managing investment advisory accounts not involving investment supervisory services, and furnishing investment advice through consultations not involving investment supervisory services.

IAR(s) of the ETFidea may offer to provide investment advisory services to clients where custody of the account is maintained at Fidelity Investments, Pershing, LLC or other custodians. At a minimum, each client will receive confirmation of all trades, monthly statements of activity and balances, and quarterly consolidated appraisals with asset performance calculations.

IAR's of the ETFidea may enter into solicitation agreements with various investment advisors or money managers that offer one or more services, such as money management or asset allocation. Under such agreements, the client pays a management fee to the advisory firm or money manager based on the amount of assets under management. ETFidea or its IARs are normally paid a fixed portion of the manager's fee as a solicitor agent, as outlined in the solicitation agreement between the ETFidea and the money manager, in exchange for introducing clients to the advisory firm.

The Advisor and its IARs provide investment and portfolio management services where the advice provided is tailored to the specific needs and objectives of the client. We will, with the client, assess the risk tolerance of the client and recommend a portfolio that is within the risk tolerance range established and planned to meet the goals of the client. In implementing the portfolio, ETFidea or its IARs will primarily utilize Exchange-Traded Funds (ETF's), Individual Fixed Income Securities, or Mutual Funds. The Advisor or its IARs may include other security types it may deem prudent. Each IAR has their own investment strategy which they will disclose to their clients, and design portfolios to achieve their client's investment goals. IARs will select Pershing, LLC (Pershing) or Fidelity Brokerage Services LLC, (Fidelity) to act as custodian for the accounts.

As of December 31, 2020, ETFidea managed \$336,455,000 of assets, of which \$334,185,000 was on a discretionary basis and \$2,270,000 was non-discretionary.

Item 5 Fees and compensation

ETFidea charges for services in three distinct ways. A flat fee can be negotiated for financial planning services, an hourly rate (not exceeding \$350) per hour may be charged for limited engagements, or an asset management fee. In excess of 90% of ETFidea's fees are asset management fees. Flat fees and hourly fees are for financial planning services, including but not limited to:

- (a) Education Planning
- (b) Estate Planning
- (c) Tax Planning
- (d) Investment Planning
- (e) Risk Management
- (f) Death, Disability and Retirement Planning

Asset Management fees are computed as follows:

The maximum annual asset management fee charged will be 2.50% plus an account administrative fee of one hundred dollars per quarter for accounts with less than one hundred thousand dollars. Fees are billed in advance of each calendar quarter based on the value of the account on the last business day of the ending quarter, and if applicable, an administrative fee. The client authorizes payment of the fee directly to the Applicant from the account upon presentation of the invoice. IARs, at their discretion, and on a case by case basis may negotiate and discount management fees with clients. The following fee schedule depicts the maximum management fees that a client may be charged:

Asset Base	Annual Fee	Quarterly Administrative Fee
Up to \$ 99,999	2.50%	\$100
\$100,000 - \$300,000	2.25%	None
\$300,001 - \$500,000	2.00%	None
\$500,001 - \$750,000	1.75%	None
\$750,001 - \$1,000,000	1.50%	None
Over \$1,000,000	1.00%	None

The fees above represent the full range of fees that may be charged. Currently, our fees actually charged range from .25% to 1.75%, however we reserve the right to charge up to the maximum fee per the schedule.

Management fees are separate and distinct from other fees that might apply, including transaction fees, underlying mutual fund fees and expenses paid to the fund by shareholders of the fund as outlined in each fund's prospectus, and custodial fees. The Advisor will absorb all cost of executing trades, including commissions on stock purchases, loads on funds purchases and spreads on bonds. Clients will be responsible for internal expenses of ETF's and or Mutual Funds in their account.

Terms of Agreement - Services are continuous but may be terminated for any reason by either party upon written receipt of such termination by the parties. Clients will receive a pro-rated refund of unearned fees based on the number of days that have elapsed in the quarter.

The owners and IARs of ETFidea may also be employed by a broker-dealer and perform services as a general agent and earn compensation from commissions on the sale of mutual funds, stocks, insurance and other financial products. These transactions are distinct from ETFidea services, but may be offered to the same clients as ETFidea. It is important for the client to understand the differences of the compensation received for the services provided, as it could result in a conflict for an advisor to make recommendation based on the compensation received as opposed to the needs of the client.

Our client's interests always come first, and we mandate that all advisors reply in full to any questions from a client as to how compensation is earned, and fully disclose all options that they feel could meet the client's needs.

Clients can always purchase recommended investments from other providers as opposed to ETFidea or its advisors.

ETFidea does not charge advisory fees in addition to markups or commissions.

Item 6 Performance based fees

ETFidea does not charge performance based fees, therefore this item is not applicable.

Item 7 Types of clients served

ETFidea clients may be comprised of individuals, businesses, trusts and retirement plans.

The minimum dollar value to open an account is twenty-five thousand dollars (\$25,000). The Applicant, at its discretion, reserves the right to negotiate the minimum account size.

Item 8 Methods of analysis, investment strategies and risk of loss

The Applicant and its IARs provide their clients with an asset allocation model portfolio designed to achieve the client's investment objectives. IARs will utilize various methods of analysis including, but not limited to charting, fundamental, technical, and cyclical in determining the securities best suited for the client's portfolio.

The Applicant and its IARs may also utilize the internet as a resource to obtain research and information on investments and investment related issues.

Item 9 Disciplinary information

There are no disciplinary actions to disclose, therefore this item is not applicable.

Item 10 Other financial industry activities and affiliations

William Kriesel is a registered principal with Cadaret Grant & Co., Inc. He is also a Life, Health and Accident insurance agent. He is also a CPA and partner in the accounting firm of Bowers & Co., CPAs, PLLC. Each of the activities generates income to Mr. Kriesel personally. It could be a conflict of interest for Mr. Kriesel when a client of ETFidea uses other services provided by Mr. Kriesel or his related business entities. All clients are made aware of Mr. Kriesel's business interests and are fully informed when there will be compensation to Mr. Kriesel from an entity other than ETFidea.

Michael D'Avirro is a registered representative and a Life, Health and Accident insurance agent. He is also a CPA and partner in the accounting firm of Bowers & Co., CPAs, PLLC. Each of the activities generates income to Mr. D'Avirro personally. It could be a conflict of interest for Mr. D'Avirro when a client of ETFidea uses other services provided by Mr. D'Avirro or his related business entities. All clients are made aware of Mr. D'Avirro's business interests and are fully informed when there will be compensation to Mr. D'Avirro from an entity other than ETFidea.

George Nardone, Katelyn Kriesel and Kevin Visconti are either a registered principal (Visconti) or registered representatives (Nardone and Katelyn Kriesel) with Cadaret Grant & Co., Inc. They are also Life, Health and Accident insurance agents. Each of these activities generates income to the individuals personally. It could be a conflict of interest for each of the individuals when a client of ETFidea uses other services provided by them or their related business entities. All clients are made aware of the business interests and are fully informed when there will be compensation to the individuals from an entity other than ETFidea.

Item 11 Code of ethics, participation or interest in client transactions and personal trading

ETFidea, LLC has adopted the following Code of Ethics to comply with SEC Rule 204A-1.

ETFidea places the utmost priority on maintaining high standards of integrity and professionalism by its associated persons in the conduct of its advisory business. The greatest asset held by this Firm is the trust and confidence placed in it by the clients. It is incumbent upon all members of the Firm to maintain, further and adhere to the tenet that the clients' interest is paramount in all that we do. The following procedures have been formulated to ensure that these fiduciary obligations are met. In addition, since some associated persons of ETFidea have received the CFP® Certification from the Certified Financial Planner Board of Standards, Inc. Our Code of Ethics is outlined as follows:

- (a) **Integrity:** *IARs, employees and officers of ETFidea will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Certificants are placed in position of trust by clients and the ultimate source of that trust is the certificant's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.*
- (b) **Objectivity:** *IARs, employees and officers of ETFidea will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which a certificant functions, certificants should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.*
- (c) **Competence:** *IARs, employees and officers of ETFidea will maintain the knowledge and skills necessary to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Certificants make a continuing commitment to learning and professional improvement.*
- (d) **Fairness:** *IARs, employees and officers of ETFidea will be fair and reasonable in all professional relationships, and all conflicts of interest will be disclosed. Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interest. Fairness is treating others in the same fashion that you would want to be treated.*

- (e) **Confidentiality:** *IARs, employees and officers of ETFIdea will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.*
- (f) **Professionalism:** *IARs, employees and officers of ETFIdea will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business related activities. Certificants cooperate with fellow certificants to enhance and maintain the profession's public image and improve the quality of services.*
- (g) **Diligence:** *IARs, employees and officers of ETFIdea will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.*

ETFIdea and its representatives do not participate or have an interest in any client transactions.

ETFIdea has a policy that prohibits its advisors from trading in any securities purchased or sold for any client on the same day as the client transaction.

Item 12 Brokerage practices

ETFIdea and/or its IARs may recommend broker/dealers to their clients. Some factors in which the Applicant considers prior to recommending other broker/dealers include their financial strength, reputation, execution, pricing, and service. Currently the Applicant and its IAR's recommend Cadaret, Grant & Co., Inc (Cadaret, Grant), Fidelity Brokerage Services, LLC (Fidelity), and Pershing, LLC (Pershing) registered broker-dealers and SIPC members to their clients. The Applicant's IARs are also Registered Principals or Representatives of Cadaret, Grant & Co., Inc. Fidelity and Pershing maintain custody of client's assets and effect trades for our advisory client's accounts. Pershing, LLC also acts as Cadaret, Grant's clearing broker. The Applicant is independently owned and operated, and is not affiliated with Cadaret, Grant, Fidelity, or Pershing.

The commissions and/or transaction fees charged by Fidelity or Pershing may be higher or lower than those charged by other broker-dealers. The commissions

paid by our clients shall comply with our procedures to obtain “best execution.” However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the Applicant determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while ETFidea and/or its IAR's will seek competitive rates they may not necessarily obtain the lowest possible commission rates for their client's transactions.

Fidelity and Pershing do not charge a separate fee for custody of client's accounts that they maintain, but is compensated by account holders through commissions or other transaction related fees for security trades that are executed through them or settle into their accounts. Certain fees for IRA accounts and inactive accounts may apply from the custodian.

ETFidea may receive other products and services from Fidelity or Pershing that benefit ETFidea but not our client's accounts. Some of these other products and services assist the applicant in managing and administering the client's accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); facilitate payment of our fees from our client's accounts; and assist with back office functions, record keeping and client reporting. These services may be used to service all or a substantial number of our accounts, including accounts not maintained at Fidelity.

Item 13 Review of accounts

IAR's of the applicant may introduce their advisory clients to money managers or other investment advisory firms. These sponsors provide reporting, monitoring and review services as described in their respective contracts with the client.

For clients receiving investment advisory services from the applicant or its IARs, clients are informed that should their investment objectives change during the course of their investment program, that they are required to notify the Applicant or its IAR. This notification will trigger an account review. In addition, each IAR (Katelyn Kriesel, George Nardone, and Kevin Visconti) will review their client accounts at least quarterly. The number of client accounts reviewed by each IAR will vary depending on the number of clients each IAR has under their management.

Clients will not receive regular reports from ETFidea, although customized reports are available upon request and may be provided by the portfolio manager at review meetings.

Item 14 Client referrals and other compensation

ETFidea has entered into solicitor agreements with other individuals. When a solicitor refers a client to ETFidea, the solicitor is compensated. In all cases where a solicitor is compensated, full disclosure is given to the client including who is being compensated, and how much they are compensated.

The following is the standard solicitor payment schedule, but again each arrangement is specifically disclosed to any client in which a solicitor is compensated.

Initial Account Value	Standard Solicitor Fee Schedule
Up to \$99,999	0.00%
\$100,000 - \$299,999	0.50%
\$300,000 - \$499,999	0.50%
\$500,000 - \$749,999	0.50%
\$750,000 - \$999,999	0.40%
Over \$1,000,000	0.25%

Item 15 Custody of client funds

ETFidea does not maintain custody of any client funds. All holdings are in the custody of Fidelity Investments, Pershing, LLC or another unrelated custodian.

ETFidea or your portfolio manager may provide you with internally generated statements either at review meetings or upon your request. ETFidea urges you to compare the information provided on our internally generated statements to the statements received directly from the custodian.

Item 16 Investment discretion

ETFidea and its advisers accept discretionary authority to trade on behalf of its clients. This discretionary authority is detailed in the contract between ETFidea, the portfolio manager and the client.

Item 17 Voting of client securities

ETFidea and its IARs are expressly precluded from taking any action on behalf of the Client, will not take any action on behalf of the client, and are not obligated to render any advice to the Client, with respect to:

- (a) The voting of proxies solicited by, or with respect to, the issuers of any securities held in the portfolio or,
- (b) The legal proceedings involving securities or other investments presently or formerly held in the portfolio, or the issuers thereof, including bankruptcies.

The custodian will send all proxy and legal proceedings information and documents it receives to the client so that the client may take whatever action the client deems appropriate.

Item 18 Financial information

ETFidea does not enter into any client transaction which would require the filing of financial information with this brochure.

Additional disclosures

ETFidea does not guarantee the future investment performance of the client's account, or the success of any specific investment strategy or overall management of the client's investment portfolio. Any investments utilizing equity or other security transactions can result in loss.

As a fiduciary, ETFidea endeavors to act in the best interest of its clients.