

Item 1: Cover Page
Part 2A of Form ADV: Firm Brochure
August 30, 2024

SWP Investment Management LLC
5005 Rockside Road #1200
Independence, OH 44131
www.swp-invest.com

Firm Contact:
Matthew Bures
Chief Compliance Officer

This brochure provides information about the qualifications and business practices of SWP Investment Management LLC. If clients have any questions about the contents of this brochure, please contact us at (216) 800-9000 or info@swp-invest.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 our firm is also available on the SEC's website at www.adviserinfo.sec.gov by searching CRD #331314.

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

Item 2: Material Changes

Annual Update

SWP Investment Management LLC is required to make clients aware of information that has changed since the last annual update to the Firm Brochure (“Brochure”) and that may be important to them. Clients can then determine whether to review the brochure in its entirety or to contact us with questions about the changes.

Material Changes since the Last Annual Update

This is the updated Brochure dated August 30, 2024. Since the firm’s Initial Brochure filing:

Firm Ownership Information was updated in Item 4.
The firm updated the fee billing language in Item 5.

Full Brochure Availability

The Firm Brochure for SWP Investment Management LLC is available by contacting Matthew Bures at (216) 800-9000 or by e-mail at info@swp-invest.com.

In 2024 all new clients are being provided a full copy of our brochure.

Item 3: Table of Contents

Item 1: Cover Page	1
Item 2: Material Changes	2
Item 3: Table of Contents	3
Item 4: Advisory Business	4
Item 5: Fees & Compensation	4
Item 6: Performance-Based Fees & Side-By-Side Management	5
Item 7: Types of Clients & Account Requirements	5
Item 8: Methods of Analysis, Investment Strategies & Risk of Loss	6
Item 9: Disciplinary Information	10
Item 10: Other Financial Industry Activities & Affiliations	10
Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading	11
Item 12: Brokerage Practices	12
Item 13: Review of Accounts or Financial Plans	14
Item 14: Client Referrals & Other Compensation	14
Item 15: Custody	14
Item 16: Investment Discretion	14
Item 17: Voting Client Securities	15
Item 18: Financial Information	15
Item 19: Requirements for State-Registered Advisors	15
Item 20: Strategic Wealth Partners Privacy Notice	16

Item 4: Advisory Business

Firm Description

Our firm is dedicated to providing customized portfolio management of exchange traded funds.

Principal Owners

Our firm is a limited liability company formed under the laws of the State of Ohio in 2024 and has been in business as an investment adviser since that time. Our firm's primary owners are Mark Tepper and Nathan Fischer. Four other Strategic Wealth Partners Ltd. employees are minority owners.

Types of Advisory Services

The primary service offered by SWP Investment Management LLC is customized portfolio management of exchange traded funds. Our objective is to develop portfolios that meet your specific investment goals.

As a fiduciary it is our duty to always act in the client's best interest. This is accomplished in part by knowing the client. Our firm has established a service-oriented advisory practice with open lines of communication. Working with clients to understand their investment objectives while educating them about our process, facilitates the kind of working relationship we value.

Tailored Relationships

Our firm will work with clients to make portfolios the provide for their specific investment needs.

Wrap Fee Programs

Our firm does not offer or sponsor a wrap fee program.

Regulatory Assets Under Management

Our firm has the following assets under management:

Discretionary Amount	Non-discretionary Amount	Date Calculated
0	0	April 26, 2024

Item 5: Fees & Compensation

Management fees are based on the value of assets managed and fees are calculated as a percentage of assets under management. Fees are referenced in the current prospectus.

Description The firm will receive a specific amount of the overall basis points charged by the Exchange Traded Funds (ETFs) the firm manages as the primary advisor over the ETFs.

Fee Billing

The Firm serves as the investment advisor for managing Exchange Traded Funds. The firm charges the funds a specific amount of basis points for managing the Exchange Traded Funds.

Other Fees

Clients will incur transaction charges for trades executed in their accounts (see Item 12, which discusses our brokerage practices). These transaction fees are separate from our firm's advisory fees and will be disclosed by the chosen custodian. Clients may also pay holdings charges imposed by the chosen custodian for certain investments, charges imposed by an index fund, or exchange traded fund. which shall be disclosed in the fund's prospectus.

Fees Paid in Advance and Termination of Advisory Services

Our fees are charged daily based upon time invested in the ETF. Termination can be done at anytime without notice. There will be no refunds as clients will only be charged for their time in the ETF

Additional Compensation

Our firm and representatives do not sell securities for a commission in advisory accounts. The firm does not receive any additional compensation for providing portfolio management services to .

Item 6: Performance-Based Fees & Side-By-Side Management

Sharing of Capital Gains or Capital Appreciation

Our firm does not charge performance-based fees.

Item 7: Types of Clients & Account Requirements

Description

We specialize in portfolio management for Exchange Traded Funds.

Account Minimums

There are no account minimums.

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

Methods of Analysis and Associated Risks

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Charting Analysis involves the use of patterns in performance charts. Our firm uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Asset Selection

- Selection decisions are made as if we were actually buying the business. Important variables we consider and review include:
 - Free cash flow / earnings growth
 - Return on invested capital
 - Niche products with long histories of success
 - Sustainable dividends, preferably rising
 - Pension fund health
 - Management capabilities
- Once a company is selected to our "Selection List", price becomes the critical variable. We would love to own all of the companies on our List, but if their prices are too high (price/earnings), or the downside risk is not worth the potential upside return we hold off on investing until a more favorable time and target price to invest presents itself.
- In the fixed income area, our basic research often produces better returns for clients than simply relying on the rating agencies, which often base ratings on long-term factors. If, in the short-term, the balance sheet is strong and cash flow is positive, then a short-term note of a lower rated company may be as safe as a note of a highly rated company, but at a much better return.

Investment Strategies

We create our investment portfolios utilizing the strategies listed below:

- Our equity positions tend to be concentrated in 40-60 holdings
- For assets on which we cannot do primary research, we use low cost exchange traded funds (ETFs).

Risk of Loss

PRINCIPAL RISKS

Before investing in the Fund, you should carefully consider your own investment goals, the amount of time you are willing to leave your money invested, and the amount of risk you are willing to take. Remember, in addition to possibly not achieving your investment goals, you could lose all or a portion of your investment in the Fund over long or even short periods of time. The principal risks of investing in the Fund are:

- **Equity Market Risk.** Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change.
- **General Market Risk; Recent Market Events.** The market value of a security may move up or down, sometimes rapidly and unpredictably. These fluctuations may cause a security to be

worth less than the price originally paid for it, or less than it was worth at an earlier time. Market risk may affect a single issuer, industry, sector of the economy or the market as a whole. U.S. and international markets have experienced volatility in recent months and years due to a number of economic, political and global macro factors, including rising inflation, problems in the banking sector, the war between Russia and Ukraine and the impact of the coronavirus (COVID-19) global pandemic. While U.S. and global economies are recovering from the effects of COVID-19, labor shortages and the inability to meet consumer demand have restricted growth. Uncertainties regarding the level of central banks' interest rate increases, political events, the Russia-Ukraine conflict, trade tensions and the possibility of a national or global recession have also contributed to market volatility.

Global economies and financial markets are increasingly interconnected, which increases the possibility that conditions in one country or region might adversely impact issuers in a different country or region. Continuing market volatility as a result of recent market conditions or other events may have adverse effects on the Fund's returns. The Adviser will monitor developments and seek to manage the Fund in a manner consistent with achieving the Fund's investment objective, but there can be no assurance that it will be successful in doing so.

Cybersecurity Risk. With the increased use of technologies such as the Internet to conduct business, the Fund is susceptible to operational, information security, and related risks. Cyber incidents affecting the Fund or its service providers may cause disruptions and impact business operations, potentially resulting in financial losses, interference with the Fund's ability to calculate its net asset value ("NAV"), impediments to trading, the inability of shareholders to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs.

- **Value Investing Risk.** Value investing entails certain risks, including that if the market does not recognize that a certain security is undervalued, the prices of that security might not appreciate as expected. A value approach could also result in fewer investments that increase rapidly during times of market gains and could cause the Fund to underperform funds that use a growth or non-value approach to investing.
- **Liquidity Risks.** The Fund may not be able to sell a security when it wants. Liquidity risk may make it more difficult to sell or buy a security at a favorable price or time.
- **Foreign Investing Risks.** Political, social, currency-rate fluctuations, and economic instability within foreign countries may cause the value of the Fund's foreign investments to decline.
- **Investing in ADRs and Domestically Traded Securities of Foreign Issuers Risks.** Because the Fund may invest in ADRs and other domestically traded securities of foreign companies, the Fund's share price may be more affected by foreign economic and political conditions, taxation policies, and accounting and auditing standards than would otherwise be the case.
- **Derivatives Risk.** An investment in derivatives may not perform as anticipated by the Sub-Adviser, may not be able to be closed out at a favorable time or price, or may increase the

Fund's volatility. Derivatives may also create investment leverage, and, when a derivative is used as a substitute for or alternative to a direct cash investment, the transaction may not provide a return that corresponds precisely or at all with that of the cash investment. In addition, when a derivative is used for hedging purposes, it may not provide the anticipated protection, causing the Fund to lose money on both the derivatives transaction and the exposure the Fund sought to hedge.

- **Risks of Derivatives.** Derivatives are financial contracts whose value depends on, or is derived from, the value of an underlying asset, reference rate, or index, and may relate to stocks, bonds, interest rates, currencies or currency exchange rates, commodities, and related indexes. Put and Call Options Risk: As a seller (writer) of a put option, the adviser will tend to lose money if the value of the reference index or security falls below the strike price. As the seller (writer) of a call option, the adviser will tend to lose money if the value of the reference index or security rises above the strike price. As the buyer of a put or call option, the adviser risks losing the entire premium invested in the option if the adviser does not exercise the option.
- **Management Risk:** The performance of the Fund will depend on whether or not the Adviser is successful in pursuing the Fund's investment strategies.
- **New Fund Risk.** The Fund is a recently organized investment company with no operating history. As a result, prospective investors have no track record or history on which to base their investment decision. Additionally, the Fund's investment adviser has not previously managed a registered fund, which may increase the risk of investing in the Fund.
- **New Adviser Risk.** SWP Investment Management, LLC (the "Adviser") is a newly registered investment adviser and has not previously served as an adviser or sub-adviser to a registered investment company. As a result, there is no long-term track record against which an investor may judge the Adviser and it is possible the Adviser may not achieve the Fund's intended investment objective.
- **ETF Risks.** The Fund is an ETF, and, as a result of an ETF's structure, it is exposed to the following risks:
 - *Authorized Participants, Market Makers, and Liquidity Providers Concentration Risk.* The Fund has a limited number of financial institutions that may act as Authorized Participants ("APs"). In addition, there may be a limited number of market makers and/or liquidity providers in the marketplace. To the extent either of the following events occur, Shares may trade at a material discount to net asset value ("NAV") and possibly face delisting: (i) APs exit the business or otherwise become unable to process creation and/or redemption orders and no other APs step forward to perform these services, or (ii) market makers and/or liquidity providers exit the business or significantly reduce their business activities and no other entities step forward to perform their functions.
 - *Cash Redemption Risk.* The Fund's investment strategy may require it to redeem Shares for cash or to otherwise include cash as part of its redemption proceeds. The Fund may be required to sell or unwind portfolio investments to obtain the cash needed to distribute redemption proceeds. This may cause the Fund to recognize a capital gain that it might not

have recognized if it had made a redemption in-kind. As a result, the Fund may pay out higher annual capital gain distributions than if the in-kind redemption process was used. In addition, cash redemptions may incur higher brokerage costs than in-kind redemptions, and these added costs may be borne by the Fund and negatively impact Fund performance.

- *Costs of Buying or Selling Shares.* Due to the costs of buying or selling Shares, including brokerage commissions imposed by brokers and bid-ask spreads, frequent trading of Shares may significantly reduce investment results and an investment in Shares may not be advisable for investors who anticipate regularly making small investments.
- *Shares May Trade at Prices Other Than NAV.* As with all ETFs, Shares may be bought and sold in the secondary market at market prices. Although it is expected that the market price of Shares will approximate the Fund's NAV, there may be times when the market price of Shares is more than the NAV intra-day (premium) or less than the NAV intra-day (discount) due to supply and demand of Shares or during periods of market volatility. This risk is heightened in times of market volatility, periods of steep market declines, and periods when there is limited trading activity for Shares in the secondary market, in which case such premiums or discounts may be significant.
- *Trading.* Although Shares are listed for trading on Nasdaq (the "Exchange") and may be traded on U.S. exchanges other than the Exchange, there can be no assurance that Shares will trade with any volume, or at all, on any stock exchange. In stressed market conditions, the liquidity of Shares may begin to mirror the liquidity of the Fund's underlying portfolio holdings, which can be significantly less liquid than Shares, and this could lead to differences between the market price of the Shares and the underlying value of those Shares.

Operational Risk. Operational risks include human error, changes in personnel, system changes, faults in communication, and failures in systems, technology, or processes. Various operational events or circumstances are outside the Adviser's control, including instances at third parties. The Fund and the Adviser seek to reduce these operational risks through controls and procedures. However, these measures do not address every possible risk and may be inadequate to address these risks.

Investment Strategies We Use

Our firm uses Long-Term Trading and Short-Term Trading. We utilize investment strategies that are designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and the account(s) could enjoy a gain, it is also possible that the stock market may decrease, and the account(s) could suffer a loss. It is important that clients understand the risks associated with investing in the stock market, are appropriately diversified in investments, and ask any questions.

Item 9: Disciplinary Information

Legal and Disciplinary

Registered Investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SWP Investment Management LLC and the integrity of our management of your assets. We have no information that applies to this item.

Criminal or Civil Action

Registered Investment advisors are required to disclose all material facts regarding any criminal or civil actions that would be material to your evaluation of SWP Investment Management LLC. and the integrity of our management of your assets. We have no information that applies to this item.

Administrative Proceeding

Registered Investment advisors are required to disclose all material facts regarding any administrative proceeding that would be material to your evaluation of SWP Investment Management LLC and the integrity of our management of your assets. We have no information that applies to this item.

Self-Regulatory Proceeding

Registered Investment advisors are required to disclose all material facts regarding any self regulatory proceedings that would be material to your evaluation of SWP Investment Management LLC and the integrity of our management of your assets. We have no information that applies to this item.

Item 10: Other Financial Industry Activities & Affiliations

Broker-dealer or Registered Representative

The investment advisor representatives of SWP Investment Management LLC are not registered representatives of a broker dealer or affiliated with a broker dealer.

Futures Commission Merchant, Commodity Pool Operator, Commodity Trading Adviser or Associated Person

SWP Investment Management LLC and our staff are not affiliated with a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Adviser.

Material Relationships or Arrangements with Financial Industry

Mark Tepper is a licensed insurance agent and majority owner of Strategic Wealth Planners, LLC an insurance agency. Mark Tepper is an investment advisor representative and majority owner of Strategic Wealth Partners Ltd. Investment advisor representatives (IARs) are also IARs of Strategic Wealth Partners Ltd. In addition, representatives of our firm may be licensed insurance agents of Strategic Wealth Planners, LLC and offer advice and fixed insurance products and receive normal and customary commissions as a result of any purchases made by the clients. Clients are under no obligation to purchase these products. To mitigate this conflict of interest, disclosures are made to the client at time of purchase, identifying the nature of the transaction and relationship, the role to be played by and any compensation paid to our advisory representatives. In every case the interests of the clients are placed before that of our advisory representatives. ADV Part 2A – Firm Brochure Page 11 Strategic Wealth Partners, Ltd. Representatives of our firm are licensed or non-practicing attorneys with Strategic Wealth Partners, Ltd. These services are independent of investment advisory services and are governed under a separate engagement agreement. Clients may be solicited to utilize these services; however, they are under no obligation to do so. Our firm offers services through our network of investment advisor representatives (“Advisor Representatives” or “IARs”). IARs may have their own legal business entities whose trade names and logos are used for marketing purposes and may appear on marketing materials or client statements. Clients should

understand that the businesses are legal entities of the IAR and not of our firm. The IARs are also under the supervision of our affiliate firm, Strategic Wealth Partners, Ltd., and the advisory services of the IAR are provided through our firm.

Recommend or Select Other Investment Advisors

We do not recommend or select other investment advisors for our clients.

Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

Code of Ethics

SWP Investment Management LLC has adopted a Code of Ethics. Our Officers and staff members are required to provide us with a written acknowledgement regarding the Code of Ethics. The Code of Ethics covers the following areas:

1. Definition of Terms
2. Standard of Conduct & Statement of General Fiduciary Principles
3. Protecting Inside Information
4. Restrictions on Personal Investing
5. Reporting Personal Securities Transactions and Accounts
6. Monitoring Personal Securities Transactions
7. Administration of the Code of Ethics and Violations
8. Acknowledgement of Code of Ethics

Upon employment with our firm, and at least annually thereafter, all representatives of our firm will acknowledge receipt, understanding and compliance with our firm's Code of Ethics. Our firm and representatives must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients.

SWP Investment Management LLC will provide a copy of the Code of Ethics to clients and prospective clients upon request. To obtain a copy contact Matthew Bures at (216) 800-9000 or by e-mail at info@swp-invest.com.

Recommend Securities with Material Financial Interest

SWP Investment Management LLC may recommend to clients investments in which it, or a related person, may have some financial interest. In such cases, Strategic Wealth Partners Ltd. fully discloses the relationship, and requires the client to affirm, in writing, that they understand the relationship.

Invest in Same Securities Recommended to Clients

Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics. Our firm also believes that if investment goals are similar for clients and for our representatives, it is logical, and even desirable, that there be common ownership of some securities.

Personal Trading Policies

Our fiduciary duty is the underlying principle for our firm's Code of Ethics, which includes procedures for personal securities transaction and insider trading. Our firm requires all representatives to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Our firm recognizes that the personal investment transactions of our representatives demand the application of a Code of Ethics with high standards and requires that all such transactions be carried out in a way that does not endanger the interest of any client.

In order to prevent conflicts of interest, our firm has established procedures for transactions effected by our representatives for their personal accounts¹. In order to monitor compliance with our personal trading policy, our firm has pre-clearance requirements for all of our representatives.

Compliance with Department of Labor Fiduciary Rule

Our firm provides investment advice to assets affected by the Department of Labor (“DOL”) Fiduciary Rule for a level fee. As such, we abide by the Impartial Conduct Standards as defined by the DOL. To comply with these standards, our firm and our advisors give advice that is in our clients’ best interest, charge no more than reasonable compensation (within the meaning of ERISA Section 408(b)(2) and Internal Revenue Code Section 4975(d)(2), and make no misleading statements about investment transactions, compensation, conflicts of interest, and any other matters related to investment decisions.

As a level-fee fiduciary, we maintain a non-variable compensation structure that is provided on the basis of a fixed percentage of the value of assets or a set fee that does not vary with the particular investment recommended, as opposed to a commission or other transaction-based fee.

Item 12: Brokerage Practices

Selecting a Brokerage Firm

Our firm does not maintain custody of client assets. Client assets must be maintained by a qualified custodian. Our firm seeks to recommend a custodian who will hold client assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. The factors considered, among others, are these:

- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation
- Quality of services

US Bank serves as the custodian and trading intermediary for SWP Investment Management LLC.

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 the value of research provided, execution capability, commission rates, and responsiveness. Although our firm will seek competitive rates, to the benefit of all clients, our firm may not necessarily obtain the lowest possible commission rates for specific client account transactions.

Soft Dollars

Our firm does not receive soft dollars in excess of what is allowed by Section 28(e) of the Securities Exchange Act of 1934. The safe harbor research products and services obtained by our firm will generally be used to service all of our clients but not necessarily all at any one particular time.

Client Brokerage Commissions

Schwab and Fidelity do not make client brokerage commissions generated by client transactions available for our firm's use.

Client Transactions in Return for Soft Dollars

Our firm does not direct client transactions to a particular broker-dealer in return for soft dollar benefits.

Brokerage for Client Referrals

Our firm does not receive brokerage for client referrals.

Directed Brokerage

Our firm routinely requests that clients direct us to execute through a specified broker-dealer. Our firm recommends the use of Schwab or Fidelity. Each client will generally be required to establish their account(s) with Schwab or Fidelity if not already done. Please note that not all advisers have this requirement.

Special Considerations for ERISA Clients

A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, our firm will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

Client-Directed Brokerage

Our firm allows clients to direct brokerage outside our recommendation. Our firm may be unable to achieve the most favorable execution of client transactions. Client directed brokerage may cost clients more money. For example, in a directed brokerage account, clients may pay higher brokerage commissions because our firm may not be able to aggregate orders to reduce transaction costs, or clients may receive less favorable prices.

Aggregation of Purchases or Sales

Our firm provides investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when our firm believes that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, our firm attempts to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13: Review of Accounts or Financial Plans

Periodic Reviews

One of the firm's ETF portfolio managers reviews each portfolio at least daily.

Review Triggers

When securities held in an Exchange Traded Fund are to be sold, accounts are reviewed immediately; either prior to or after the security is sold. When any security is bought, accounts are reviewed immediately; either prior to or just after the security is purchased. One of the firm's portfolio managers monitor each portfolio at least daily.

Regular Reports

The broker dealer handling your account or custodian sends you account statements at least quarterly, but usually monthly. These account statements show money balances, securities held in the account, investment values and transactions made.

Item 14: Client Referrals & Other Compensation

Economic Benefits

For the benefit we receive from other broker dealers see the "Brokerage Practices" section above.

Third Party Solicitors

SWP Investment Management LLC will not use solicitors to introduce potential clients.

Item 15: Custody

Account Statements

Our firm does not have custody of client funds or securities. All of our clients receive account statements directly from their qualified custodians at least quarterly upon opening of an account. If our firm decides to also send account statements to clients, such notice and account statements include a legend that recommends that the client compare the account statements received from the qualified custodian with those received from our firm. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

Item 16: Investment Discretion

Discretionary Authority for Trading

The firm will have discretion over the selection, amount and timing of securities to be bought and sold for Exchange Traded Fund portfolios and accounts. This means that the portfolio manager will purchase or sell securities consistent with the investment objectives of the ETF.

Limited Power of Attorney

The firm will not accept limited power of attorney.

Item 17: Voting Client Securities

Our firm will vote proxies for the Exchange Traded Funds the firm manages per the fund prospectus.

Item 18: Financial Information

Prepayment of Fees

The firm will not receive fees in advance.

Financial Condition

The firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients.

Bankruptcy

The firm has never been subject to a bankruptcy proceeding.

Item 19: Requirements for State-Registered Advisors

This section is not applicable to SWP Investment Management LLC.

Item 20: SWP Investment Management LLC Privacy Notice

FACTS

WHAT DOES SWP INVESTMENT MANAGEMENT LLC DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and account balances
- assets and income
- investment experience and risk tolerance

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons SWP chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SWP share?	Can you limit this sharing?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes- information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes – Information about your creditworthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

To limit our sharing

- Call us at 216-800-9000.

Please note:

If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.

Questions?

Call us at 216-800-9000.

Who is providing this notice?	SWP Investment Management LLC. (“Strategic Investment Management” or “SWP IM”)
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What we do	
How does SWP protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>To protect you from “phishing” and other fraudulent activities, we will never request that you provide personal information to us via unsolicited e-mails, text messages or pop-up windows.</p>
How does SWP collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • enter into an investment management agreement • make a wire transfer or tell us where to send the money • open an account or make deposits or withdrawals from your account
Why can’t I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates’ everyday business purposes – information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Our affiliates include Strategic Wealth Partners, Ltd. and Strategic Wealth Planners, LLC.
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • SWP IM does not share with nonaffiliates so they can market to you.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • Our joint marketing partners include an insurance agency and providers of legal services.