

SWP Investment Management LLC

Form CRS - Client Relationship Summary (Form ADV, Part 3)

Date: 09/05/2024

Item 1: Introduction

Our firm, SWP INVESTMENT MANAGEMENT LLC ("SWP IM") is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

Questions to ask us: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What investment services and advice can you provide me? We offer investment advisory services to mutual fund/ETF portfolios and retail investors, including comprehensive portfolio management, financial planning and consulting, and retirement plan consulting. We will discuss your investment goals and design with you a strategy to help you achieve your investment goals. For our comprehensive portfolio management clients, we will monitor your account on a continuous basis. Such monitoring is part of our standard services offered to such clients.

Your contract with us for comprehensive portfolio management services gives us discretionary authority when managing your account(s), which, while you maintain your account with us, allows us to buy and sell investments in your account(s) without asking you in advance.

We offer advice with respect to individual stocks, bonds, exchange traded funds, options, mutual funds, and other public and private securities or investments. We may limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio.

For additional information, please see our Form ADV, Part 2A Brochure, specifically Items 4 and 7, for more detailed information about the services we offer.

Item 3: Fees, Costs, Conflicts, and Standard of Conduct

Questions to ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? How might your conflicts of interest affect me, and how will you address them?

What fees will I pay? Fees and costs affect the value of your account over time. If you open an advisory account, you will pay an ongoing asset-based fees, assessed on a quarterly basis in advance of services or charged in arrears of receiving services as specified in your agreement with us based on the market value of your account at quarter end. You pay our fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investments selected.

If you are a comprehensive portfolio management client, the more assets you have in the advisory account, including cash, the more you will pay us. As a result, while we may have an incentive to recommend that you increase the assets in your accounts, we would only recommend additional investment(s) if we believed it was in your best interest to do so in light of your particular objectives and financial situation.

In addition to our firm's portfolio management fee, some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your

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investment over time. The same goes for any additional fees you pay to a custodian. Additionally, you will pay transaction fees, if applicable, when we buy or sell an investment for your account. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.** Please also see Items 4, 5, 6, 7, 8 of our Brochure for additional details.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?: *When we act as your investment adviser*, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means (see heading immediately below).

How do your financial professionals make money? Primarily, we and our financial professionals receive cash compensation from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Please also see Item 10 of our Brochure for additional details.

Another example to help you understand what this means. Representatives of our firm may be licensed insurance agents of Strategic Wealth Planners, LLC, an insurance agency and affiliate of SWP IM. Such representatives may offer advice and fixed insurance products and receive normal and customary commissions as a result of any purchases made by our clients. We only recommend insurance products when we believe it is in the best of our clients to do so.

Item 4: Disciplinary History

Questions to ask us: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Do you or your financial professionals have legal or disciplinary history? No. We do not have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

Questions to ask us: *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

For additional information on our advisory services, see our Brochure available at <https://adviserinfo.sec.gov/firm/summary/331314> or www.swp-invest.com and any individual brochure supplement your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 216-800-9000.