

Sawston Wealth Management LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Sawston Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (360) 464-2025 or by email at: colleen.gillespie@comcast.net. 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 Sawston Wealth Management LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Sawston Wealth Management LLC's CRD number is: 281222.

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Registration does not imply a certain level of skill or training.

Version Date: 02/20/2024



Item 2: Material Changes

The last annual updating amendment of Sawston Wealth Management LLC was on 02/02/2023. Material changes relate to Sawston Wealth Management LLC policies, practices or conflicts of interests only.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Sawston Wealth Management LLC (hereinafter "SWMLLC") is a Limited Liability Company organized in the State of Washington. The firm was formed in August 2015 and became registered as an investment adviser in October 2015. The principal owners are Colleen H Gillespie and Patrick T Gillespie.

B. Types of Advisory Services

Portfolio Management Services

SWMLLC offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. SWMLLC creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- | | |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy |
| • Asset allocation | • Asset selection |
| • Risk tolerance | • Regular portfolio monitoring |

SWMLLC evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. SWMLLC will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

SWMLLC seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of SWMLLC's economic, investment or other financial interests. To meet its fiduciary obligations, SWMLLC attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, SWMLLC's policy is to seek fair and equitable allocation of investment opportunities/ transactions among its clients to avoid favoring one client over another over time. It is SWMLLC's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Sawston Direct Portfolio Management Services

SWMLLC also provides portfolio management services through the SawstonDirect platform, an online interface. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each client and based on individual characteristics, such as the client's age, risk tolerance, income, and current assets, among others. SWMLLC's investment advisory personnel oversee the algorithm

but may not monitor each client's account. Clients are encouraged to update their SawstonDirect account with any change in their objectives, risk tolerance, or other pertinent information, as that information factors into the portfolio's composition.

Pension Consulting Services

SWMLLC offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans) based on the demographics, goals, objectives, time horizon, and/or risk tolerance of the plan's participants.

Financial Planning

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

SWMLLC generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds and non-U.S. securities. SWMLLC may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

Client accounts are generally invested into a target allocation depending on the client's individual profile. This automated approach factors in client financial situation and risk tolerance, although the algorithms used to provide advisory services are designed to be utilized by SWMLLC across multiple clients. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. SWMLLC does not participate in any wrap fee programs.

E. Assets Under Management

SWMLLC has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 22,672,157.00	\$ 2,809,777.00	December 2023

In addition to our regulatory AUM, we also are advisor to one 401k plan, with AUM \$25,481,675.00 as of 12/31/23.

Item 5: Fees and Compensation

A. Fee Schedule

Asset-Based Fees for Portfolio Management

Total Assets	Annual Fee
\$0 - \$500,000	1.25%
\$500,001 - \$1,000,000	1.10%
\$1,000,001 - \$2,000,000	1.00%
\$2,000,000 – And Up	0.85%

In all instances, SWMLLC will send the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based. Also, SWMLLC will include the name of the custodian(s) on the fee invoice. SWMLLC will send these to the client concurrent with the request for payment or payment of SWMLLC's advisory fees. We urge the client to compare this information with the fees listed in the account statement.

These fees are generally negotiable, and the final fee schedule is attached as Exhibit I of the advisory contract. SWMLLC uses the value of the account as of the last business day of the prior billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Clients may terminate the agreement without penalty and for a full refund of SWMLLC's fees within five business days of signing the advisory contract. Thereafter, clients may terminate the advisory contract generally with 30 days' written notice.

SawstonDirect Portfolio Management Services Fees

The following are the fees charged by Sawston Wealth Management LLC for services provided through the SawstonDirect platform:

SWMLLC will not be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of Client. Due to mutual fund minimum purchases, there is an account minimum of \$500 for a retirement account (IRA, ROTH IRA, SEP-IRA, etc.) and \$1,000 for a non-retirement or taxable account.

Total Assets	Annual Fee
\$0 - \$500,000	.75%
\$500,001 - \$1,000,000	.65%
\$1,000,001 - \$2,000,000	.55%
\$2,000,000 – And Up	.45%

These fees are negotiable and the final fee schedule is attached as Exhibit I of the SawstonDirect Investment Advisory Contract.

SWMLLC uses the value of the account as of the last business day of the prior billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

SWMLLC collects fees monthly in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account. For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.) Clients may terminate the agreement without penalty, for full refund of SWMLLC's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract with thirty days' written notice.

Asset-Based Fees for Pension Consulting

Total Assets	Annual Fee
\$0 - \$500,000	1.25%
\$500,001 - \$1,000,000	1.10%
\$1,000,001 - \$2,000,000	1.00%
\$2,000,000 – And Up	0.85%

These fees are generally negotiable and the final fee schedule is attached as Exhibit I of the advisory contract. SWMLLC uses the value of the account as of the last business day of the prior billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Clients may terminate the agreement without penalty and for a full refund of SWMLLC's fees within five business days of signing the advisory contract. Thereafter, clients may terminate the advisory contract generally with 30 days' written notice. SWMLLC bills based on the balance on the first day of the billing period.

Hourly Fees for Pension Consulting

The non-negotiable hourly fee for these services is \$225. The final fee schedule will be attached as Exhibit II of the advisory contract.

Clients may terminate the agreement without penalty and for a full refund of SWMLLC's fees within five business days of signing the advisory contract. Thereafter, clients may terminate the advisory contract generally with 30 days' written notice. SWMLLC bills based on the balance on the first day of the billing period.

Hourly Financial Planning Fees

The non-negotiable hourly fee for these services is \$225. Clients may terminate the agreement without penalty and for a full refund of SWMLLC's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of "Traditional" Portfolio Management Fees

Asset-based portfolio management fees are either withdrawn directly from the client's accounts with client's written authorization or invoiced and billed directly to the client. Clients may select the method in which they are billed. Fees are paid monthly in advance.

Payment of SawstonDirect Portfolio Management Fees

SawstonDirect portfolio management fees are withdrawn directly from the client's accounts with client's written authorization. Fees are paid monthly in advance.

Payment of Asset-Based Pension Consulting Fees

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in advance.

Payment of Hourly Pension Consulting Services Fees

Hourly pension consulting fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

Payment of Hourly Financial Planning Fees

Financial planning fees are paid via check, cash, and wire. Hourly financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

C. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e., custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by SWMLLC. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

SWMLLC collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

E. Outside Compensation for the Sale of Securities to Clients

Neither SWMLLC nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

SWMLLC does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

SWMLLC generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit-Sharing Plans
- ❖ Charitable Organizations
- ❖ Corporations or Business Entities

There is no account minimum for any of SWMLLC's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

SWM LLC's methods of analysis include fundamental analysis, cyclical analysis, quantitative analysis and modern portfolio theory.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

SWM LLC uses long term trading, including in its SawstonDirect offering. **Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Quantitative Model Risk: Investment strategies using quantitative models may perform differently than expected as a result of among other things, the factors used in the models,

the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

SawstonDirect uses algorithms as the basis of the portfolio management process. Risks of this approach include, but are not limited to, that the algorithm might rebalance client accounts without regard to market conditions that the accounts may be automatically rebalances on a more frequent basis or a less frequent basis than the client might expect, and that the algorithm may not address prolonged changes in market conditions. Additionally, clients should be aware that responses to the adviser's suitability questionnaire are typically the sole basis for the portfolio's allocation.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither SWMLLC nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither SWMLLC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Colleen H Gillespie provides nonprofit consulting on a periodic basis. From time to time, she may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. SWMLLC always acts in the best interest of the client and clients are in no way required to the services of any representative of SWMLLC in connection with such individual's activities outside of SWMLLC.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

SWMLLC does not utilize nor select third-party investment advisers. All assets are managed by SWMLLC management.

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

A. Code of Ethics

SWMLLC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. SWMLLC's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

SWMLLC does not recommend that clients buy or sell any security in which a related person to SWMLLC or SWMLLC has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of SWMLLC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SWMLLC to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SWMLLC will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of SWMLLC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of SWMLLC to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, SWMLLC will never engage in trading that operates to the client's disadvantage if representatives of SWMLLC buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on SWMLLC's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and SWMLLC may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in SWMLLC's research efforts. SWMLLC will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

SWMLLC will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC/NFA.

1. *Research and Other Soft-Dollar Benefits*

While SWMLLC has no formal soft dollars program in which soft dollars are used to pay for third party services, SWMLLC may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). SWMLLC may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and SWMLLC does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. SWMLLC benefits by not having to produce or pay for the research, products or services, and SWMLLC will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that SWMLLC's acceptance of soft dollar benefits may result in higher commissions charged to the client.

SWMLLC participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. SWMLLC receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, SWMLLC participates in TD Ameritrade's institutional advisor program and SWMLLC may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between SWMLLC's participation in the Program and the investment advice it gives to its clients, although SWMLLC receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting

services; access to a trading desk serving SWMLLC participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have SWMLLC's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to SWMLLC by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by SWMLLC's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit SWMLLC but may not benefit its client accounts. These products or services may assist SWMLLC in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help SWMLLC manage and further develop its business enterprise. The benefits received by SWMLLC or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, SWMLLC endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by SWMLLC or its related persons in and of itself creates a conflict of interest and may indirectly influence the SWMLLC's choice of TD Ameritrade for custody and brokerage services.

2. Brokerage for Client Referrals

SWMLLC receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

SWMLLC will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If SWMLLC buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, SWMLLC would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. SWMLLC would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Traditional portfolio management accounts for SWMLLC's advisory services provided on an ongoing basis are reviewed at least monthly by Colleen H Gillespie, Managing Partner, with regard to clients' respective investment policies and risk tolerance levels. All accounts at SWMLLC are assigned to this reviewer.

SawstonDirect portfolio management accounts are reviewed by SWMLLC quarterly, with automated allocation revisions or manager changes, if warranted. Clients are encouraged to update their SawstonDirect account with any change in their objectives, risk tolerance, or other pertinent information, as that information factors into the portfolio's composition.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Colleen H Gillespie, Managing Partner. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, SWMLLC's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of SWMLLC's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. SWMLLC will also provide at least quarterly a separate written statement to the client.

SawstonDirect portfolio management clients can review their performance data online upon login via SawstonDirect. Clients will receive a monthly written report that details the client's account including assets held and asset value, which report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

SWMLLC does not receive any economic benefit, directly or indirectly from any third party for advice rendered to SWMLLC's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

SWMLLC does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, SWMLLC will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

SWMLLC provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, SWMLLC generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

SWMLLC will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

SWMLLC neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with

this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither SWM LLC nor its management has any financial condition that is likely to reasonably impair SWM LLC's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

SWM LLC has not been the subject of a bankruptcy petition.

Item 19: Requirements for State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

SWM LLC currently has only one management person: Colleen H Gillespie. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

SWM LLC does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.