Item 1 Cover Page

Under SEC and similar state rules, our firm is required to deliver to clients or prospective clients a plain English brochure disclosing information about our firm. In addition, we may be required to deliver a brochure supplement disclosing information about one or more of our "supervised persons". This brochure satisfies these objectives.

Swords Wealth Management, LLC

Official Contact Information:

17074 Interstate Hwy 20 West Lindale, TX 75771 903-526-6669

March 31, 2018

FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Swords Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 903-526-6669 or 903-881-0444 or by e-mail at steve@swordswealthmanagement.com or ben@swordswealthmanagement.com. The information in this brochure has not been approved or verified by the United States Securities Exchange Commission or by any state securities authority. The statement "a registered investment adviser" does not imply a certain level of skill or training.

Additional information about Swords Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov or at www.swordswealthmanagement.com

As used in this brochure, the words "we", "our" and "us" refer to the firm of Swords Wealth Management, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. We use the terms "we" and "our" throughout this disclosure brochure to refer to the firm as an entity.

Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last updating amendment dated March 31, 2017, the following are our material changes to report:

Discretionary assets under management were changed to $16,070,332 which represents 282 accounts and non-discretionary assets were changed to $6,150769 which represents 99 accounts.

We have also modified our advisory agreement. Portfolio valuations for fee purposes will now be valued on the previous quarter end date. Previously portfolio valuation for fee purposes occurred at the end of each calendar year.

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Item 4 Advisory Business

Swords Wealth Management, LLC (formerly known as Steve A. Swords, CPA) has been a registered investment adviser since 1988. The firm transitioned from a sole proprietorship to a limited liability company established under the laws of the State of Texas in January 2013. Steve Swords and Ben Dean are the primary owners and current advisory representatives.

The firm provides investment supervisory services approximately 70% of the time in a combination of both non-discretionary and discretionary actions with client assets. These services are most often referred to as **"monitoring" and "discretionary management" services** or **Private Wealth Stewardship**.

As of December 31, 2017, the practice had approximately the following Client accounts:

Discretionary Accounts:	$16,070,332
Non-Discretionary Accounts:	$ 6,150,769
Total:	$ 22,221,101

The other 30% of the time is taken up with, on more than an occasional basis, furnishing advice to clients on matters not involving securities specifically such as **general financial and investment planning**, as well as furnishing investment advice through **consultations** or **designated accounts management** not included in investment supervisory services.

The Private Wealth Stewardship ("PWS") program is a fee-based ongoing financial planning program designed to assist a client with a number of critical consulting-related services that we believe are important to a client in creating and maintaining a sound financial plan. It is **an add-on to the monitoring and discretionary management service (see below)**. It includes the creation of both a Financial Plan and an Implementation Plan, together with initial and ongoing Investment Planning, Income Tax Planning, Estate Planning, Cash and Debt Management Planning and Insurance Planning, consulting and review services, and ongoing Progress Reports to assist the client with maintaining (and/or revising/updating) his/her/their plan and achieving their goals. The election and terms and conditions of participation in PWS are set forth in the Financial and Investment Advisory Agreement between you and our firm, provision 1 (f). Private Wealth Stewardship, and provision 9 (e) Fees to the Advisor. With respect to estate planning and accounting matters, the firm's advisory representative acts as a facilitator between the client and his/her designated professionals. Advisory representatives are not, and do not act as an attorney nor an accountant and nothing about PWS should be construed as legal or accounting advice. Rather, the client should consult his/her/their attorney or accountant.

The firm charges a flat fee for the delivery of our Private Wealth Stewardship service and once set, it becomes fixed with an annual 5% increase and will be assessed in quarterly installments. The fee runs concurrent with, but not in addition to, the percentage fee charged for assets under monitoring and management. The fee is subject to annual review and can be re-set upon mutual agreement of the advisor and client. **The fee may vary based on the following factors:**

- Complexity of client's financial affairs;
- Time and labor required to fulfill the service commitment to the client or group of clients;
- Professional skills and capacities of the advisor in delivering these services;
- Time limitations imposed by the client or by the circumstances;
- Nature and length of the advisor's professional relationship with the client;
- Experience, reputation and ability of the advisor performing the services;
- Other compensation the advisor may be receiving from the client while providing these services;
- Any other factor which may be unique to the client; and
- Competitive issues within differing geographic areas or markets.

It is our policy to provide maximum flexibility between the advisory representative and his clients based upon the uniqueness of the client's needs, local markets and client preferences. Therefore, the fee may, and most likely will, vary from one geographic area to another and could be more or less than the fee being assessed by other advisers offering same or similar services.

The range of Private Wealth Stewardship fees being assessed is available upon request. The firm evidences supervision of Private Wealth Stewardship annually through the "Annual Affirmation of Deliverables" form signed by the client following the first twelve months of such service.

No client is under any obligation to implement any of our recommendations, including investment, insurance, tax, estate planning or otherwise. The PWS fee does not include the fees that may be incurred by the client for implementation of any of our recommendations. Our recommendations may be implemented at the client's exclusive discretion with the corresponding professional adviser(s) of the client's choosing (i.e. investment adviser, securities broker, insurance agent, accountant, attorney, etc.). At the client's request, we may recommend the services of other professionals for implementation purposes, including our firm's (and/or its affiliates or representatives) investment advisory, securities brokerage and/or insurance services and those of unaffiliated professionals, including attorneys and accountants. The client is under no obligation to engage the services of any such recommended professionals. Separate and additional commissions and/or fees shall be incurred for all such implementation services, including those that may be provided by us and/or our affiliates.

Monitoring and discretionary management services are the foundation of our firm's practice. Most clients will engage this service which is more limited in scope than the PWS service. Services are generally limited only to developing a perpetual financial and investment plan and implementing the investment aspects of those plans.

These services usually progress through several stages: **initial** financial and investment planning, investment **selection** and placement (or repositioning to strategy), **continual** monitoring and/or management and reporting of investment accounts, and finally, **regular** meetings with Clients to **update** planning and/or implementation actions as well as updating investment positioning and risk undertaken.

The latter is documented through an "Investment Personality Profile" and "Investment Policy Statement" update and related "Asset Structure and Strategy Plan" for placement. Finally, periodically, a "Trend Weighting Plan" is developed and approved by the client to underweight or overweight certain portions of their investment allocation to reflect changes in the dominate trend of investments whether good ("bullish"), bad ("bearish"), or in the middle ("indeterminant"). In this way, advisory services are tailored to Client's unique individual objective and risk profile as documented.

Designated accounts micro-management is an option for clients. The related new account application and advisory agreement is entitled "New Client Documents" and "Investment Advisory Services Agreement". It allows investors to hire our firm for investment micro-management services on an individual investment account basis. It differs from monitoring services in that clients only authorize access and management to a limited number of their accounts, therefore, not enabling a view of the clients overall investment program.

The programs for designated accounts micro-management include the "MMA-Tactical Aggressive" program, "MMA-Tactical Moderate" program and the "Bradly Retirement Allocation Program" described as follows:

- **MMA-Tactical Aggressive** trades exchange traded funds (ETFs) and /or open-end or closed-end mutual funds, and/or individual stocks or bonds. This program seeks to participate in select domestic and global markets and favored sectors in equity, bond, real estate, or commodity investments (including precious metals or miners). It attempts to take advantage of short term trends using either regular mutual funds or ETFs, leveraged ETFs, inverse ETFs, individual stocks or bonds, or a combination thereof. Multiple indicators are monitored to help identify developing trends in the markets. It is possible under certain market conditions to be fully invested in cash and/or short-term bonds or bond funds to help protect principal.

- **MMA-Tactical Moderate** trades exchange traded funds (ETFs) and /or open-end or closed-end mutual funds, and utilizes the Trend Weighting methodology. This program seeks to participate in either or both domestic and global markets with a focus on a broad allocation of equity, bond, real estate, or commodity investments (including precious metals or miners). It attempts to reduce the extra risk and trading costs associated with more aggressive trading by more emphasis on intermediate trends and use of regular mutual funds or unleveraged ETFs; and by reduced exposure to leveraged ETFs or inverse ETFs. Multiple indicators are monitored to help identify developing trends in the markets. It is possible under certain market conditions to be fully invested in cash and/or short-term bonds or bond funds to help protect principal.

- **Bradly Retirement Allocation Program** is a program with two primary objectives: low volatility and consistent absolute returns. It uses the Trend Weighting strategy that could underweight equity exposure reducing equity allocation in increments to as low as 0% if a bearish trend is confirmed. The program is allocated to three (3) "baskets of money": 1) *Yield-focused investments* providing a high dividend yield and total return target between 6% and 8%; 2) *Growth-oriented investments* with a further allocation between money managed accounts [MMAs] that could be exclusively tactical (can have as little as 0% exposure to equities at any given time) or exclusively strategic (maintaining a buy and hold philosophy) as well as growth focused mutual funds or ETFs and limited individual stock ownership; and 3) *Cash or Liquidity Focused Investments* which provide for the investors current distribution needs; these could include brokerage accounts or Money Market, Income, or Balanced Mutual Funds which allow for systematic liquidations. Allocation between Yield-focused versus Growth-focused investment depends on the risk tolerance of the account holder. To hedge against inflation or loss of purchasing power, the allocation can include positions which give exposure to various commodity and currency markets. The program's goal is to consistently provide returns of at least 6% per year with lower volatility than pure equity market exposure and less than 10% maximum drawdown. No assurance can be given that these objectives will be met. As part of the allocation, MMAs are separately managed with more narrow objectives and may incur higher volatility, additional fees and trading charges [see separate program information].

Selection of Other Advisers

As part of our investment advisory services, we may select or recommend that you use the services of a third party money manager ("MM") to manage a portion of your investment portfolio in a separate money managed account ("MMA"). After gathering information about your financial situation and objectives, we will recommend that you engage a specific MM or investment program and open a MMA. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: MM's performance, methods of analysis, fees, the custodian of the MMA, your financial needs, investment goals, risk tolerance, and investment objectives. We will periodically monitor the MM(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives.

The MM(s) will actively manage your designated MMA assuming discretionary investment authority over it. We may assume discretionary authority to hire and fire MM(s) and/or reallocate your assets to other MM(s) where we deem such action appropriate. SWM may act as solicitor on separately managed accounts. As such we will disclose to the client the total fee as well as SWM’s portion of the total fee.

Types of investments
Types of investments of normal use in the course of the practice include equity securities [including exchange traded funds and other exchange listed or over-the-counter securities], corporate debt securities [such as bonds but not including commercial paper], certificates of deposit, municipal securities, investment companies securities [including variable life insurance, variable annuities, and mutual funds shares], United States government securities, options contracts on securities, and interests in nonliquid or ill-liquid investments in real estate, oil and gas interests, equipment leasing, or other direct participation investments.

Where discretionary authority is not requested, client's investment experience is taken into account with special emphasis on educating clients as to the objectives and risk assumed in various types and categories of investments. Clients, whether giving discretionary authority to the firm or not, are frequently given an opportunity to eliminate certain types or categories of investment.

Item 5 Fees and Compensation

Our firm offers investment advisory services for the following types of compensation:
1. a percentage of assets under monitoring and management
2. a percentage of assets under designated accounts management
3. hourly charges
4. fixed fees (not including subscription fees)
5. Solicitor fees

Fees for initial financial and investment planning or a more abbreviated **custom planning** are billed on either **a fixed fee basis** dependent upon services provided and/or the gross assets of the client, **or an hourly basis**, at various rates, dependent on the services given and/or the billing rates of the professionals and staff performing the services required. Fees may be estimated for a new client and billed to the client on a flat, fixed fee basis for this service.

> The most common circumstance is to pay $2500 for planning which includes the production of a financial roadmap workbook, implementation action steps, and a web-based model for tracking forward progress. (For estates with assets in excess of $2,000,000 or income in excess of $300,000 the fee is $3000.)

Other **custom planning services** include abbreviated investment planning, basic retirement needs planning, divorce planning, or estate planning as well as a hired review of existing plans and consultation. Fixed fees for these services range from $1000 to $2500. Hourly fees are based on $250 per hour.

Asset Advisory Services (based on percentage of assets under monitoring and management)

After the completed initial financial and investment planning documentation is delivered, additional services including, but not limited to, continual monitoring or management of financial and investment planning decisions are normally agreed upon.

Monitoring and management services and periodic revisions to the asset allocation decisions are provided on both a non-discretionary and discretionary basis with a separate asset schedule adopted for each.

During the monitoring period, occasional strategic or tactical repositioning may be recommended. The intent is to execute advice or discretionary authority with minimal transaction charges.

Annual monitoring and management fees are based on the net asset value on the valuation date of a client's existing investment portfolio assets as listed in the schedules of their advisory agreement. Investment portfolio assets include the net equity of all scheduled assets plus any additions to scheduled accounts unless mutually excluded by client and the firm.

These fees are paid quarterly in advance commencing on the date our firm begins to provide such services. If during any period there are contributions to the Investment Portfolio and/or the Employee Savings Plan, we shall be entitled to additional compensation with respect to such contributions, prorated from the date of contribution to the Investment Portfolio and/or the Employee Savings Plan. Such additional compensation with respect to any quarter shall be added to the following quarterly installment.

Monitoring and discretionary management, management services and designated accounts micro-management services valuation date shall initially be the month end date listed on the advisory agreement Schedule 1 first initialed by the Client. Thereafter, the valuation date shall be based on the value of your account(s) on the last business day of the previous quarter with adjustments to fee amounts occurring at the first subsequent billing. The fee schedule for supervisory services is the same for all clients and is not negotiable except where assets monitored exceed $2,000,000 or restrictions in account apply. The minimum annual fee for monitoring and discretionary management services is $3,000 (or fee on $200,000 assets plus the cost of accounting reports paid annually, if lower).

Fee Schedule as a percentage of assets under monitoring and management:

The Annual Fee Schedule is as follows:

		Quarterly Fee	Annual Fee	
On first	$ 500,000	.3750%	1.500%	
On next	$ 500,000	.3125%	1.250%	****negotiable*
On next	$1,000,000	.2500%	1.000%	
On amount over	**$2,000,000	.1875%	.750%	

Fees are paid quarterly in advance. We will not require prepayment of a fee more than six months in advance and in excess of $500. Clients may elect to have quarterly fees deducted directly from their accounts or to be billed directly. Fees are only deducted from accounts on which the custodian has agreed to provide regular statements showing all activity including fee withdrawals. Therefore, duplicate invoices are not provided to clients unless requested.

Clients may be charged annual custodial fees, mortality charges and expenses on insurance company accounts, expenses by mutual funds or other investment company accounts, and brokerage or other transaction costs with third-party brokerage accounts which our firm does not share in.

As indicated in Item 4, the **Private Wealth Stewardship ("PWS") program** is a fee-based ongoing financial planning program which is an add-on to the monitoring and discretionary management program. Our firm charges a flat fee for the delivery of our PWS service and once set, it becomes fixed with an annual 5% increase and will be assessed in quarterly installments. The fee is subject to annual review and can be reset upon mutual agreement between our firm and the client. The fee may vary from one client to another based on the factors listed in Item 4.

Every monitoring and discretionary management client, including PWS clients, are charged a percentage fee based on the fee schedule above. PWS clients receive one dollar credit toward their PWS fixed fee for each dollar collected based on the percentage fee. Effectively, PWS clients will pay the higher of the percentage fee of assets under monitoring and discretionary management or the PWS fee, but not both.

Designated Accounts Micro-management fees range from 1.0% to 2.5% per annum, paid by the client on a quarterly basis in advance and deducted from client assets. Fees are negotiable based on size of account, other services being rendered, length of time with an advisory representative or any other factors deemed applicable at the firm's sole discretion. Therefore, the fees paid by some clients may vary from the fees paid by other clients for the same or similar programs or services. All fees assessed for designated accounts management are individually disclosed to the client and approved with the client's signature.

Implementation Costs: Clients may have the option to purchase investment or insurance products that our firm's advisory representatives recommend through other brokers or agents that are not affiliated with our firm. Where investments are purchased through an institutional brokerage platform [i.e. TD Ameritrade Institutional], we receive no markup or commission compensation. Customary brokerage transaction charges may apply.

For existing clients, during a prior implementation process, the client may have chosen to purchase securities through a broker-dealer in which commissions were earned. Therefore, advisory fees may be paid on assets that the client has paid commissions on.

With regard to non-liquid, nondiscretionary assets, accounting firms or agents have made available to clients like ours an agreement to monitor, account for and furnish data to reporting investment advisers on "direct participation" alternative investments that are illiquid or non-liquid in nature. We make this and any other similar offers available to all clients investing in such investments. For an hourly fee or an annual flat fee per alternative investment per year, clients may hire these accountants under a separate agreement with them for alternative investment accounting. Our firm and its representatives do not share in these fees.

Should clients reject the offer for outside accounting for these investments, such alternative investments may be included in the advisory agreement **at the client exclusive election** in the client's Schedule 1 (1) as non-liquid, non-discretionary assets and our firm will provide these services as well as reporting at an annual fee of 0.90% which may be higher than the cost of a third-party service.

Clients not requesting investment monitoring or discretionary management services, but merely wishing private consultations to ask questions, etc., will be advised as circumstances dictate. They are charged a flat fee or an hourly consultation fee which is dependent upon the planning service or the billing rates of the professionals providing such consultation.

Any trips made by the advisory representative to visit clients, or on their behalf, may be charged directly to the client, including both travel expenses and travel time. **Termination of services** can occur upon thirty days written notice to the other party by certified or registered mail. No refunds will, however, be made after the first five business days. Fees are earned to the end of the quarter in which written notice of termination is received by the firm.

Because of all the preliminary research and analysis having gone into the making of the original recommendation and allocation, client agrees that if they terminate this contract within the first 6 months, that the firm is entitled to a fee equal to a minimum of 6 months of this contract, which is due at termination date, if not previously collected.

If termination of the advisory agreement occurs after the first 6 months, fees are earned to the end of the quarter in which written notification of termination is received; therefore, there is **no pro rata refund of fees paid**.

Selection of Other Advisers
The advisory fee you pay to the MM is established and payable in accordance with the brochure provided by each MM to whom you are referred. These fees may or may not be negotiable. We may share in the advisory fee you pay directly to the MM or may bill for MM fee directly to the custodian as authorized under a separate Designated Accounts Management agreement. Since this referral fee is a portion of the MM fee you would otherwise pay to the MM, it does not cause you to incur any additional fees. Our compensation may differ depending upon the individual agreement we have with each MM. As such, a conflict of interest exists where our firm or advisory representatives with our firm has an incentive to recommend one MM over another MM with whom we have more favorable compensation arrangements or other advisory programs offered by MMs with whom we have less or no compensation arrangements.

You will be required to sign an agreement directly with the recommended MM(s). You may terminate your advisory relationship with the MM according to the terms of your agreement with the MM. You should review each MM's brochure for specific information on how you may terminate your advisory relationship with the MM and how you may receive a refund, if applicable. You should contact the MM directly for questions regarding your advisory agreement with the MM.

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

No performance-based fees are charged or accepted.

Item 7 Types of Clients

Our firm generally makes available investment advisory services to individuals, retirement, pensions and profit sharing plan account owners [including IRA or 401(k) accounts], trusts, estates or charitable organizations or corporations or business entities other than those previously mentioned.

Generally, our clients are individual family households and all registration types owned by the individuals of that household [i.e. IND, JTWROS, CP, IRAs, 401(k), etc.].

While there is no minimum account size, normally, household investments are a minimum of $200,000.

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

Our security analysis methods include charting, fundamental analysis, technical analysis and cyclical analysis. We use the following sources of information: consultation with other investment advisors, financial newspapers and magazines [both hard copy and online], research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with Securities and Exchange Commission, and company press releases.

Investing in securities involves risk of loss the clients should be prepared to bear. Each household, or on rare occasions an individual account, develops an Investment Policy Statement that defines the client's layers of investment risk based on time horizon and cash needs; generally, the more time horizon [i.e. five-year increments] the greater the tolerance of risk, and target rate of return.

An "Asset Structure and Strategy Plan" is developed using "baskets of money" for each time horizon and risk tolerance. Risk is defined by statistical mean standard deviations for various asset classes. On the "Asset Structure and Strategy Plan" this is stated as estimated maximum drawdown ranges in any given year [i.e. 5% to 10%, 10% to 15%, 20% to 30%, etc].

The investment markets are dynamic. Statistical mean standard deviations of history may not be repeated and while returns may be estimated, there is no guarantee that a return will be achieved or that the loss will not be greater than the historical means. Complete loss of principal is possible.

We employ various investment strategies to implement our advice. Strategies generally fall into the following categories: long-term purchases (securities held at least a year); short-term purchases (securities sold within a year); trading (securities sold within 30 days); short sales; margin transactions; option writing, including covered options, uncovered options spreading strategies.

Strategic investment strategies such as the "Asset Structure and Strategy Plan" will be impacted by various market trends. A "bullish" trend in equities may cause the equity portion of the strategy to achieve normal returns while the fixed income portion may lose money. A "bearish" trend in equities may cause the equity portion of the strategy to lose money while the fixed income portion may gain. A "neutral" or indeterminate trend in equities may warrant a reduction in equity exposure awaiting clarification. Under some circumstances, both equity and fixed income assets will lose principal at the same time.

Periodically, a "Trend Weighting Plan" is developed and approved by the client to assist in guiding investment management of a client's discretionary accounts. The plan is used in conjunction with the Asset Structure and Strategy Plan to rebalance or reallocate and/or to underweight or overweight certain portions of their investment allocation to reflect changes in the dominate trend of major market indices; whether good ("bullish"), bad ("bearish"), or in the middle ("indeterminate"). In this way, advisory services are further tailored to Client's unique individual objectives and risk profile.

Risk may also be somewhat mitigated by the buying of put options or the writing of covered call options in order to preserve principal or enhance income. Use of options in client accounts is very limited at this time. Options are not suitable for all clients and additional suitability requirements must be met by use of custodians (such as TD Ameritrade, etc.) screening procedures and account applications before options can be used.

Tactical investment strategies for some or all accounts of the household attempt to reduce investment risk. Through technical analysis and relative strength weighting, underperforming investments may be under weighted and stronger performing investments may be over weighted.

Discretionary authority over an account may be given by written agreement signed by the client to hire a third party micro-manager. There is no guarantee that such micro-management of these accounts will perform as intended. In addition, in some cases such strategies involve more frequent trading which can increase brokerage and other transaction costs and taxes and, therefore, decrease overall performance.

Specific equities such as single stock ownership involve significant risks. Business management risk, industry risk, and legal risk are involved in addition to normal market risk. Complete loss of principal is possible. Diversification through multiple asset ownership or mutual funds or index funds may lower risk compared to single stock ownership.

Alternative investments, sometimes called Direct Participation Investments, are often ill-liquid or non-liquid, and often held either as limited partnerships or non-traded investment trusts. These investments pose significant risk and should only be undertaken with thorough due diligence and understanding. The underlying direct operation of these investments and the initial "soft" costs of these investments pose significant non-controllable risks such as industry or business management risks and, therefore, should warrant the hope of above average gain. In many cases, only certain investors known as "accredited investors" who can afford to lose 100% of their investment should buy these investments.

Item 9 Disciplinary Information

Neither our firm nor any of our management persons has any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

Our firm's representatives may be engaged in business activities other than giving investment advice on behalf of our firm.

The firm's advisory representatives, Steve Swords and Ben Dean are personally involved in insurance sales. For these services, they receive commission compensation in addition to any compensation they receive from the firm as advisory representatives to firm clients. To the extent they receive compensation for insurance sales to a firm client and also may receive fee compensation paid by a firm client, a conflict of interest exists. Such conflicts are disclosed in this brochure. Clients are under no obligation to purchase products Swords Wealth Management LLC or its management persons may recommend, or to purchase products or services through Swords Wealth Management LLC or its management persons.

Steve Swords is the administrative partner of an income tax return preparation practice where he spends less than 1% of his time. He is not involved as a practitioner in that practice.

Recommendation of Other Advisers -We may recommend that you use a third-party adviser ("MM") based on your needs and suitability. We may receive compensation from the MM for recommending that you use their services. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of the third-party adviser. You are not obligated, contractually or otherwise, to use the services of any MM we recommend.

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

Our firm's representatives may maintain accounts at TD Ameritrade Institutional, Inc ("TD") and may effect transactions in their own account as recommended to clients who hold securities at TD or other similar brokerage accounts. Investments of advisory representatives will be bought and sold on the same basis as the client. In most instances, the positions would be so small and would have an immaterial impact on the pricing or performance of the security.

Code of Ethics: Our firm has adopted a Code of Ethics Policy ["Policy"] to mitigate conflicts of interest from personal trading by associated persons and has established standards of conduct expected of its associated persons. We have set forth in the "Policy" statements of general principals, required course of conduct, reporting obligations, and review and enforcement of the Policy. We will provide a copy of the Code of Ethics Policy to our clients or prospective clients upon written request.

Individuals associated with our firm may buy or sell for their personal account(s) investments identical to those recommended to clients. It is the express policy of our firm that employees shall not have priority in any purchase or sale over clients' accounts. The Policy requires specific course of conduct and implicit fair dealing in all relationships with clients including in trading personal accounts.

Front-running -executing personal trades before pending client orders to take advantage of potential price action is strictly prohibited. All associated persons are expected to adhere strictly to the guidelines of the Policy.

In addition, our firm maintains and enforces written policies reasonably designed to prevent the misuse of **material non-public information** by any person associated with our firm.

Item 12 Brokerage Practices

Our firm receives no soft dollar benefits from recommending a broker dealer or brokerage platform to clients. Further, we cannot directly or indirectly cause brokerage commissions to be marked up or marked down.

The firm receives no client referrals from a broker dealer or third-party brokerage platform referral. As a general rule we recommend brokerage platforms/custodians that offer clients good order execution and favorable commission prices. We have found TD Ameritrade Institutional to be one such custodian. Normally, client accounts are maintained with only one custodian, however, where situations compel a second custodian, we will not hesitate to advise such. We do not require our clients to direct brokerage.

Clients may be allowed to direct brokerage; however, such direction may result in higher brokerage commissions because we would be unable to aggregate orders to reduce transaction costs or the client may receive less favorable prices.

In some circumstances, **orders to purchase or sell securities may be aggregated** for efficiency, favorable prices, and/or discounted brokerage commission, if available.

Generally, if mutual funds or limited partnerships are acquired directly from distributors by client at our recommendation, the client's broker is used. If client does not have a broker, or cannot purchase a specified product from his or her broker, another broker may be selected. No services or compensation, beyond that available to any individual investor, is received by our firm's advisory representative from any broker selected by them.

Today, many mutual funds impose **short-term redemption fees**. In recent rule-making (Rule 22c-2 of the Investment Company Act), the SEC appears to be encouraging, though not mandating, the use of short-term redemption fees in order to curb unsavory trading practices that may disadvantage other investors in the same fund. Rule 22c-2 permits registered open-end investment companies to impose a redemption fee not to exceed 2% of the amount redeemed. We will occasionally use accounts held directly at a mutual fund family or variable annuity group or have placed their assets on a brokerage platform where we may use mutual funds as part of the client's allocation. Our firm's philosophy is to invest client accounts in the appropriate mix of investments under the current market conditions. As

Those conditions change and our investment work changes, client allocations are adjusted. Because our approach is active, there may be instances where the short-term redemption fee is incurred (especially on new accounts).

Many of our clients have asked us to manage their accounts either directly at a mutual fund family or variable annuity group. Where investments are held directly, a third-party authorization, if available, is normally given by the client and used by the firm to manage the account.

Item 13 Review of Accounts

All reviews are performed by professional employees as financial planners, not by paraprofessionals or clerical employees. Accounts are reviewed as required by changing economic, investment, or client circumstances. Clients must request reviews unless under continual monitoring and discretionary management, in which case periodic reviews are initiated by the advisory representative. There is no specified number of accounts for each reviewer. **Steve Swords and Ben Dean are the reviewers for our firm.**

Comprehensive financial planning clients receive an **initial financial planning report/action plan**. For piecemeal planning or for consultations, clients receive a summary of recommendations and related action items. Investment monitoring and discretionary management clients receive a **quarterly report** summarizing their asset diversification including estimates of a breakdown by type of asset and overall investment performance.

Semi-annual meetings incorporate asset re-allocation discussion based on current position reports of asset diversification by time horizon and risk/reward. An Asset Structure and Strategy Plan is developed. A trend weighting plan is decided. Cash management plans are reaffirmed.

Item 14 Client Referrals and Other Compensation

We do not provide anyone outside our practice with an economic benefit for client referrals.

As disclosed under Item 5 (Fees and Compensation) in this brochure, our firm may receive compensation (solicitor fees) from third party money managers for referring clients. For information on the conflicts of interest these types of arrangements present and how we address the conflicts, please refer to Item~~s~~ 5 of this brochure.

Item 15 Custody

Our firm does not maintain custody of any Client funds or securities. Qualified custodians, brokerage companies, or mutual fund companies provide statements to Clients either by mail or electronically.

Household investment reports furnished by our firm should be compared with account statements received from qualified custodians.

Item 16 Investment Discretion

We may have authority to determine, without obtaining specific client consent, certain securities and amounts to be bought or sold in the client's "discretionary" accounts. Specific accounts allowed this authority are listed on the "Financial and Investment Advisory Agreement -Schedule 1 [2] Liquid Discretionary Investment Portfolio Assets". This schedule is approved annually by each client as evidenced by initialing the schedule in their advisory agreement. At any time, client may amend Schedule 1[2] to restrict discretionary authority.

In general, clients may limit discretionary authority of accounts by placing accounts on Schedule 1 [1] [i.e. "Liquid & Non-liquid Nondiscretionary Investment Portfolio Assets"] of the advisory agreement. Where third party micro-managers are employed to manage accounts, such accounts are considered nondiscretionary to our firm because discretionary authority is given to the third party micro-manager.

Where we have discretion to select brokerage, our general guiding principal is to obtain best asset monitoring ability and the best overall trade execution for each client, which is a combination of price and execution. With respect to execution, we consider a number of judgmental factors, including, without limitation, the actual handling of the order, the ability of the broker to settle the trade promptly and accurately, the financial standing of the broker, the ability of the broker to position stock to facilitate execution, our past experience with similar trades and other factors that may be unique to a particular order. Recognizing the value of these judgmental factors, we may recommend or select brokers who charge a brokerage commission that is higher than the lowest commission that might otherwise be available for any given trade.

Item 17 Voting Client Securities

The firm does not accept the authority to vote client securities. The advisory agreement specifically disclaims this authority. Neither will we render any recommendation with respect to voting of proxies solicited by, or with respect to, the issuers of any of the securities held in the Account.

Clients will receive their proxies or other solicitations directly from their custodian or transfer agent.

Item 18 Financial Information

We do not require or solicit prepayment of more than $500 in fees per client, six months or more in advance.

We do not currently have any financial condition that reasonably could be expected to impair our ability to meet contractual commitments to clients.

Neither the firm, Steve Swords or Ben Dean has been the subject of any bankruptcy petition in the past 10 years.

Item 19 Requirements for State-Registered Advisers

Steve Swords and Ben Dean are the only management persons and advisory representatives of our firm. Please refer to the ADV Part 2B Brochure Supplement for their background information.

Our firm is not compensated for advisory services with performance-based fees. Our firm and our management personnel do not have any reportable arbitration claims, civil, self-regulatory organization proceedings or administrative proceedings.

Our firm does not have a material relationship or arrangement with any issuer of securities.

Form ADV Part 2B Brochure Supplement for:

Steve Anthony Swords

Official Contact information:

Swords Wealth Management, LLC 17074 Interstate Hwy 20 West Lindale, TX 75771

903-526-6669 or 903-881-0444

Email: Steve@SwordsWealthManagement.com

March 31, 2018

This brochure supplement provides information about Steve Swords that supplements the firm's brochure. You should have received a copy of that brochure. Please contact us if you did not receive the Form ADV Part 2A firm brochure or if you have any questions about the contents of this supplement.

Additional information about our advisors is available on the SEC's website at www.adviserinfo.sec.gov or www.swordswealthmanagement.com.

Please retain this Form ADV Part 2B Brochure Supplement for future reference, as it contains important information. We will provide you with an updated copy of this Brochure only if there are material changes to the information in Item 3 (Disciplinary Information).

Item 2 Educational Background and Business Experience

The business background information provided below is for the last five years.

Your Financial Adviser: Steve A. Swords
Year of Birth: 1954
Education:
- Austin College, Sherman, TX, B.A., 1976
- The University of Texas at Arlington, Candidate for Master of Accountancy

Business Background:
- Swords Wealth Management, LLC, Co-manager 01/2013 to Present
- HD Vest Investment Services, Registered Representative, 11/2014 -01/2015
- Steve A Swords, Sole Proprietor, 01/1988-01/2013
- First Allied Securities, Inc., Registered Representative, 05/2012 -11/2012
- Cambridge Legacy Advisors, Inc., Investment Adviser Representative, 01/2012 -07/2012
- Cambridge Legacy Securities, L.L.C., Registered Representative, 07/2002 -05/2012

Steve has experience in the areas of Financial Planning, Limited Tax Preparation (non-public), Investment Advice, Investment Monitoring Services, Securities Transactions, and Insurance Sales.

Certifications:

- **Certified Public Accountant (CPA)-(Status-Retired)** CPA's are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

Item 3 Disciplinary Information

Steve and Ben do not have, or have ever had, any disciplinary disclosures.

Item 4 Other Business Activities

Steve is engaged in business other than giving investment advice. Steve is an independent insurance agent and has arrangements with an accounting firm that are material to the firm's advisory business and his clients. Steve spends less than 1% of his professional time on these other business activities.

Please refer to the *Fees and Compensation* section and the *Other Financial Industry Activities and Affiliations* section of the ADV Part 2A firm brochure for additional disclosures on this topic.

Item 5 Additional Compensation

Please refer to the *Fees and Compensation* section and the *Other Financial Industry Activities and Affiliations* section of the ADV Part 2A firm brochure for disclosures on Steve's receipt of additional compensation as a result of his activities as an insurance agent and as an administrative partner in an income tax return preparation practice. Also please refer to the *Fees and Compensation* section and the *Other Financial Industry Activities and Affiliations* section of the ADV Part 2A firm brochure for disclosures on Ben's receipt of additional compensation as a result of his activities as an insurance agent.

Item 6 Supervision

Ben Dean is the Chief Compliance Officer and supervises the activities of both of the firm's advisors. Ben can be reached at 903-526-6669.

Item 7 Requirements for State Registered Advisers

Neither Steve nor Ben have, or has ever had, any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

Form ADV Part 2B Brochure Supplement for:

Benjamin Herschel Dean

Official Contact information:

Swords Wealth Management, LLC 17074 Interstate Hwy 20 West Lindale, TX 75771

903-526-6669 or 903-881-0444

Email: Ben@SwordsWealthManagement.com

March 31, 2018

This brochure supplement provides information about Ben Dean that supplements the firm's brochure. You should have received a copy of that brochure. Please contact us if you did not receive the Form ADV Part 2A firm brochure or if you have any questions about the contents of this supplement.

Additional information about our advisors is available on the SEC's website at www.adviserinfo.sec.gov or www.swordswealthmanagement.com.

Please retain this Form ADV Part 2B Brochure Supplement for future reference, as it contains important information. We will provide you with an updated copy of this Brochure only if there are material changes to the information in Item 3 (Disciplinary Information).

Item 2 Educational Background and Business Experience

The business background information provided below is for the last five years.

Your Financial Adviser: Benjamin H. Dean
Year of Birth: 1963
Education: University of North Texas, Denton, TX, BBA, 1986

Business Background:
- Swords Wealth Management, L.L.C., Co-Manager/Advisor, 10/2014 to Present
- Concorde Investment Services L.L.C., Registered Representative, 02/2014 -02/2014
- Onyx Wealth Advisors, Inc. Director of Adviser Services, 04/2008 -12/2013
- Cambridge Legacy Securities, L.L.C., Registered Representative, 04/2008 -04/2012

Ben has experience in the areas of Financial Planning, Investment Advice, Asset Allocation, Investment Monitoring Services, Securities Transactions, and Insurance Sales. Ben is the chief compliance officer for Swords Wealth Management LLC.

Certifications: • **Certified Financial Planner (CFP)-(Status-Active)** CFP ® 's are licensed and regulated by the CFP Board. The CFP Board is a non-profit organization acting in the public interest by fostering professional standards in personal financial planning through its setting and enforcement of the education, examination, experience, ethics and other requirements for CFP® certification. The CFP® certification marks identify professionals who have met the high standards of competency and ethics established and enforced by the CFP Board. CFP Board's Standards of Professional Conduct require CFP® professionals to act in their clients' best interests. CFP Board's Continuing Education (CE) requirement is designed to increase the professional competency of CFP® professionals. Every two years, CFP® professionals must complete 30 hours of CE accepted by CFP Board, including two hours of CFP Board-approved Ethics CE that focuses on CFP Board's *Standards of Professional Conduct*.

Item 3 Disciplinary Information

Steve and Ben do not have, or have ever had, any disciplinary disclosures.

Item 4 Other Business Activities

Ben is engaged in business other than giving investment advice. Ben is also an independent insurance agent and spends less than 5% of his professional time on this other business activity.

Please refer to the *Fees and Compensation* section and the *Other Financial Industry Activities and Affiliations* section of the ADV Part 2A firm brochure for additional disclosures on this topic.

Item 5 Additional Compensation

Please refer to the *Fees and Compensation* section and the *Other Financial Industry Activities and Affiliations* section of the ADV Part 2A firm brochure for disclosures on Ben's receipt of additional compensation as a result of his activities as an insurance agent.

Item 6 Supervision

Ben Dean is the Chief Compliance Officer and supervises the activities of both of the firm's advisors. Ben can be reached at 903-526-6669.

Item 7 Requirements for State Registered Advisers

Neither Ben nor Steve have, or has ever had, any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.