
ITEM 1. COVER PAGE

Heritage Strategic Wealth, LLC (the "Firm" and "Advisor")



**117 W Main St.
Cary, IL 60013**

(815) 200-9774

FORM ADV PART 2A – FIRM BROCHURE

September 8, 2025

This brochure provides information about the qualifications and business practices of Heritage Strategic Wealth, LLC (the "Advisor" or "Firm"). If you have any questions about the contents of this brochure, please contact us at (815) 200-9774 or by email at brian@heritagestrategicwealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

The Advisor is a registered investment advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information to assist you when determining to hire or retain an advisor.

Additional information about Heritage Strategic Wealth, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2. MATERIAL CHANGES

Initially, we will provide you with this brochure which highlights information about our qualifications, business practices, and potential conflicts of interest. Thereafter, on an annual basis, if there have been any material changes to the information in the brochure during the previous year, we will provide you with one of the following:

- An updated annual brochure along with a summary of material changes which will be provided within 120 days of the close of our business fiscal year. Our business fiscal year-end is December 31st.
- A summary of material changes within 120 days of the close of our business fiscal year-end that includes an offer to provide a copy of the full annual updated brochure and information on how you may obtain the brochure from us.

Throughout any calendar year, we will also provide you with an updated interim amendment to our brochure under the following circumstances:

- We report any new information in response to Item 9 of Part 2A regarding disciplinary information about the Firm or any of its management personnel.
- Any material change that could affect the relationship between you and us.

We will provide, *free of charge*, a new brochure any time at your request, or as may become necessary based on material changes as outlined above.

You may request our brochure by contacting us at (847) 826-2472. You may also receive this and any other disclosure documents via electronic delivery, where allowed, by signing and returning to us an authorization to deliver disclosure and other documents electronically. This authorization may be included in any agreement you enter into with Heritage Strategic Wealth, LLC.

Additional information about Heritage Strategic Wealth, LLC, is also available via the SEC's website at www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Heritage Strategic Wealth, LLC, who are registered, or are required to be registered, as investment adviser representatives of Heritage Strategic Wealth, LLC.

Material changes since the last update:

- 1) *The phone number for the Firm has been updated.*

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ITEM 4. ADVISORY BUSINESS

DESCRIPTION OF THE ADVISORY FIRM

Heritage Strategic Wealth, LLC (hereinafter "HSW") is a Limited Liability Company organized in the State of Illinois. The firm was formed in July 2025, and the principal owner is Brian William Atkins.

TYPES OF SERVICES

INVESTMENT ADVISORY SERVICES

HSW offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. HSW creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

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

HSW evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. HSW 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.

HSW seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of HSW's economic, investment or other financial interests. To meet its fiduciary obligations, HSW attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, HSW'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 HSW'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.

HSW may recommend a third-party investment for clients. If a client wishes to pursue a third-party investment, HSW will refer the client to the third-party and the investment may be made directly with the third-party or allocated through a separately managed account managed by HSW. HSW may receive compensation for such recommendation and investment from the third-party. The compensation received by HSW from the third-party, pursuant to a fee sharing

agreement or other compensation agreement with the third-party, is not related to and does not impact the fees charged to the client and the client account(s). HSW may also allocate among one or more private equity funds or private equity fund advisers.

FINANCIAL PLANNING SERVICES

HSW may provide its clients with financial plans and financial planning services including, but not limited to, investment planning, life insurance, tax concerns, retirement planning, education planning, debt/credit planning, and profit sharing. These services are generally offered at no additional cost to all ongoing investment management clients. HSW may review accounts that the Firm does not perform investment advisory services for in order to have a more complete picture of your financial planning needs.

Investment planning involves working with clients to make sure their investments match their respective risk tolerance and goals. Tax concerns are addressed by working with the client to determine and compare effective tax rates for income, capital gains and other earnings or investments, then attempting to allocate the client's resources accordingly. Life insurance planning entails reviewing the life insurance and/or disability insurance needs of the client, together with any applicable dependents, spouse or other relatives, and assessing appropriate coverage for these individuals. College planning entails helping clients save for higher education, whether for the client or his/her children or other dependents, in the ideal manner to suit the client's overall financial goals and means. Financial planning to address retirement involves assisting clients in becoming financially equipped for retirement, taking into account their anticipated income, expenses, investments, and other assets. Debt/credit planning involves analyzing client budgets and supporting informed decision-making regarding current debt, anticipated significant expenses, potential future debt, and strategies to avoid taking on excessive debt.

In performing any financial planning services, HSW is not required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant) and is expressly authorized to rely on such information. Clients are advised that a conflict of interest may exist if HSW recommends its own or an affiliated entity's products or services. The client retains absolute discretion over all such financial planning related implementation decisions and is free to accept or reject any of the Firm's recommendations. Clients are advised that it remains their responsibility to promptly notify HSW if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising HSW's previous recommendations and/or services.

SERVICES LIMITED TO SPECIFIC TYPES OF INVESTMENTS

HSW generally limits its investment advice to mutual funds, ETFs (including ETFs in the gold and precious metal sectors), fixed income securities, real estate funds, insurance products including annuities, equities, hedge funds, private equity funds, treasury inflation

protected/inflation linked bonds, private placements, and the TrueShares Active Yield ETF, which is an ETF sub-advised by an affiliated advisor, Wealth Builder Funds, LLC. HSW may use other securities as well to help diversify a portfolio when applicable. Brian is also principle owner of Atkins & Associates, LLC and any recommendations made to clients regarding insurance products will be offered by Mr. Atkins and any commissions paid for those services and products are made to Atkins & Associates, LLC. Please see item 10.C for more details.

TERMINATION OF AGREEMENT

You may terminate any investment management agreement with us at any time by notifying HSW in writing in accordance with the terms of your Investment Management Agreement ("Agreement").

WRITTEN ACKNOWLEDGEMENT OF FIDUCIARY STATUS

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

HSW offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent HSW from properly servicing the client account, or if the restrictions would require HSW to deviate from its standard suite of services, HSW reserves the right to end the relationship.

WRAP FEE PROGRAMS

A wrap fee program is an investment program wherein the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. HSW does not currently and has no plans to participate in any wrap fee programs.

ASSETS UNDER MANAGEMENT

HSW has the following assets under management ("AUM"):

Discretionary AUM:	Non-discretionary AUM:	Total AUM:
\$ 0.00	\$ 0.00	\$ 0.00

ITEM 5. FEES AND COMPENSATION

FEE SCHEDULE

INVESTMENT MANAGEMENT FEES

Your fee will be calculated on a quarterly basis and is paid in arrears. The Firm uses the value of the account as of the last business day of the 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. That amount is then multiplied by the fee percentage, which results in an annualized fee. The annualized fee is divided by four to arrive at the quarterly fee you will be charged.

The Firm's fee may be negotiated but is generally 0.75% of the assets we manage on your behalf. HSW's annual fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses incurred by the client. HSW does not, however, receive any portion of these commissions, fees, and costs. There is no minimum account size. As previously mentioned in Item 4, and further reiterated below, HSW's management fee may also include financial planning services.

The specific annual fee schedule is identified in the Agreement between us. Your fee structure will never change from that contained in your Agreement with us unless agreed to in writing by you and made a part of your Agreement.

We request that you authorize and direct the custodian of your account(s) to pay our fees directly to us from the portfolio. However, it is your option to authorize this process, and if you do not approve of the direct deduction from your account, we will submit periodic invoices directly to you or the custodian, as you request.

Our employees, their family members, and our proprietary accounts, such as a Firm 401k plan, may be exempt from management fees charged by us to manage these accounts.

FINANCIAL PLANNING FEES

As previously mentioned in Item 4 - Advisory Business, financial planning services are generally offered at no additional cost to all ongoing investment management clients.

INVESTMENTS IN OUR AFFILIATED FIRM'S SUB-ADVISED ETF

As a part of your investment strategy, we may use the ETF sub-advised by an affiliate of HSW's. The name of the affiliate is Wealth Builder Funds, LLC ("Wealth Builder Funds", "WBF", our "Affiliated Firm", or our "Affiliate"), an SEC registered investment advisor. Wealth Builder Funds acts as the sub-advisor to the TrueShares Active Yield ETF ("Affiliated ETF"), as mentioned in Item 4. When the Affiliated ETF is used as part of your investment strategy, our Affiliate will receive a management fee that is described in the fund's prospectus. This fee will be paid to our Affiliate in accordance with the fund's prospectus and the Affiliated Firm's specific investment advisory agreement with the Affiliated ETF. In addition, when invested in the Affiliated ETF, you will indirectly bear your pro rata share of the fees, expenses, and charges described in the fund's prospectus. Such fees, expenses, and charges may include, but are not limited to, investment management fees, shareholder service fees, fees incurred for legal, audit, and custodial services provided to the Affiliate ETF, and the cost of transactions effected for the Affiliated ETF such as brokerage and execution charges, markups, and commissions.

In addition to the fee you pay us as a part of your advisory agreement with HSW, which will generally be based on the amount of assets in your account(s) that we manage on your behalf (or the otherwise enumerated methods listed above), including our Affiliated ETF, you will incur the expenses of the Affiliated ETF, including a separate investment management fee, which will be deducted directly from the account balance of the Affiliated ETF.

FEES CHARGED BY FINANCIAL INSTITUTIONS

As further discussed in response to Item 12 (below), HSW will generally utilize Charles Schwab ("Schwab") with respect to broker and custodian services for the Firm.

HSW may only implement its investment management strategy after the client has arranged for and furnished HSW with all information and authorization regarding accounts it establishes with the broker and custodian ("Financial Institutions").

Clients may incur certain charges imposed by the Financial Institutions and other third parties such as custodial fees, charges imposed directly by a mutual fund or ETF in the account, which are disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to HSW's fee.

HSW's Agreement and the separate agreement with any Financial Institution may authorize the Financial Institution to debit your account for the amount of HSW's fee and to directly remit that management fee to HSW. The Financial Institution has agreed to send a statement to the client, at least quarterly, identifying all amounts disbursed from the account including the amount of management fees paid directly to HSW. Alternatively, clients may elect to have HSW send an invoice for payment.

OUTSIDE COMPENSATION FOR THE SALE OF SECURITIES TO CLIENTS

Certain representatives of the firm in their outside business activities (see Item 10 below for more details) are licensed to accept compensation for the sale of insurance products to HSW clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of insurance products for which the supervised persons receive compensation, HSW will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase HSW recommended products and, if purchasing, have the right to purchase those products through other brokers or agents that are not affiliated with HSW.

Commissions on the sale of insurance products are not HSW's primary source of compensation for advisory services. Advisory fees that are charged to clients are not reduced to offset the commissions on insurance products recommended to clients. As discussed in more detail in Item 10 below, the commissions received by HSW are only related to the sale of insurance products. HSW does not receive commissions on other securities or investment products, and under no circumstances does HSW receive 12b-1 fees.

ITEM 6. PERFORMANCE BASED FEES & SIDE-BY-SIDE MANAGEMENT

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

ITEM 7. TYPES OF CLIENTS

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

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations

This list is not exhaustive, and HSW may provide advisory services to other types of clients as appropriate.

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

ITEM 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF LOSS

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

METHODS OF ANALYSIS

HSW's methods of analysis include Charting analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

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

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

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.

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.

Technical analysis involves the analysis of past market data; primarily price and volume.

INVESTMENT STRATEGIES

HSW primarily utilizes long-term trading strategies in managing client portfolios.

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

MATERIAL RISKS INVOLVED

METHODS OF ANALYSIS

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

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.

Modern portfolio theory assumes that investors are risk averse, 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.

Quantitative analysis 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.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

INVESTMENT STRATEGIES

HSW primarily utilizes long-term trading strategies in managing client portfolios.

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.

Selection of Other Advisers: Although HSW will seek to select only money managers who will invest clients' assets with the highest level of integrity, HSW's selection process cannot ensure that money managers will perform as desired and HSW will have no control over the day-to-day operations of any of its selected money managers. HSW would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

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

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 long-term financial products issued by insurance companies that are primarily

used for retirement planning and income generation. They are contracts between you and an insurance company that require the insurer to make payments to you, either immediately or in the future. You buy an annuity by making either a single lump-sum payment or a series of payments. This is in exchange for future income, either for a specified period or for the rest of your life. An annuity is not a life insurance policy. Fixed annuities, which are the type of annuity offered through our insurance-licensed representatives, provide a guaranteed rate of return and predictable income, making them appealing to risk-averse investors seeking stability. The guarantees are backed by the financial strength and claims-paying ability of the issuing insurance company and are not insured by the FDIC or any federal government agency. Unlike variable annuities, which are regulated by the SEC, involve investment risks similar to mutual funds, and may be subject to market volatility, the rate of return on your investments, and expenses, fixed annuities do not fluctuate in value based on market performance. However, fixed annuities still carry certain risks, such as inflation risk (the potential that fixed payments may lose purchasing power over time), liquidity risk (penalties and surrender charges for early withdrawal), and issuer risk (reliance on the solvency of the insurance company).

As referenced in Item 10 – Other Financial Industry Activities and Affiliations, certain HSW employees are licensed insurance agents who may recommend fixed annuity products when appropriate to help clients address specific income needs or risk management objectives. These individuals only sell insurance products such as fixed annuities and do not sell variable annuities.

Hedge funds often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

Private equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

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

CRIMINAL OR CIVIL ACTIONS

There are no criminal or civil actions to report.

ADMINISTRATIVE PROCEEDINGS

There are no administrative proceedings to report.

SELF-REGULATORY ORGANIZATION (SRO) PROCEEDINGS

There are no self-regulatory organization proceedings to report.

ITEM 10. OTHER FINANCIAL ACTIVITIES AND AFFILIATIONS

REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE

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

NFA REGISTRATION OF SUPERVISED PERSON, FUTURES RECOMMENDATIONS, AND POTENTIAL CONFLICTS

Brian Atkins is individually compensated as an Associated Person registered with the National Futures Association ("NFA") through Wiens Walk Wealth Management, LLC ("Wiens Walk"), an Introducing Broker ("IB") that is guaranteed by RJ O'Brien & Associates, LLC ("RJ O'Brien"), a registered Futures Commission Merchant ("FCM"), futures brokerage, and clearing firm.

HSW may recommend that certain clients open a futures account with RJ O'Brien, facilitated by Wiens Walk. In such cases, a portion of the client's assets may be moved from their custodial accounts at Schwab – which are managed by HSW – to a futures account maintained at RJ O'Brien. Wiens Walk facilitates access to futures investments.

Futures investments involve specific risks and may not be suitable for all clients. HSW will only recommend such strategies when it determines they are suitable based on a variety of factors, including, but not limited to, the client's individual circumstances, investment objectives, and risk tolerance.

HSW does not receive compensation for such activity. However, due to Mr. Atkins' affiliation with Wiens Walk and his compensation in that capacity, a potential conflict of interest exists. HSW seeks to mitigate this conflict by making recommendations it believes are suitable for the client and by disclosing that Mr. Atkins is compensated in connection with his role at Wiens Walk. Clients are under no obligation to open or maintain a futures account. Clients may instead choose to work with a different firm; however, HSW is not involved in that process. Furthermore, HSW does not assume responsibility for any third-party firms.

REGISTRATION RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND POSSIBLE CONFLICTS OF INTERESTS

Brian Atkins is 100% owner of Atkins & Associates, LLC. Atkins & Associates is the general partner of one exempt hedge fund; Global Currency Reserve, LP; a fund of funds. Heritage Strategic Wealth, LLC does not manage Global Currency Reserve, LP. Atkins & Associates operates as a commodity pool operator and Brian Atkins is a Principal for Global Currency Reserve, LP., and from time to time may offer clients advice or products from those activities. Clients should be aware that these services may involve a conflict of interest. HSW will only recommend such products or services when it determines they are suitable based on a variety of factors, including, but not limited to, the client's individual circumstances, investment objectives, and risk tolerance. Clients are in no way required to utilize any of the products or services of any affiliate or representative of HSW.

Brian Atkins is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. HSW will only recommend such products when it determines they are suitable based on a variety of factors, including, but not limited to, the client's individual circumstances, investment objectives, and risk tolerance. This includes the sale of commissionable products to advisory clients. The commissions earned by Mr. Atkins are paid to HSW by an independent marketing organization. Clients are in no way required to implement the plan through any representative of HSW in their capacity as a licensed insurance agent.

SELECTION OF ALTERNATIVE OUTSIDE INVESTMENTS AND COMPENSATION FOR THOSE SELECTIONS

HSW may direct clients to alternative outside investments. HSW will be compensated via a fee share from the third-party to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that HSW has an incentive to direct clients to the third-party for the client's direct investment with that third-party as HSW has entered into a fee sharing agreement or other compensation arrangement with said third-party. HSW will always act in the best interests of the client, including when determining which third-party investment to recommend to clients.

AFFILIATED ADVISORS AND AFFILIATED FUNDS

At no time is your advisory agreement to work with our Firm conditioned upon using the Affiliated ETF. While we feel we understand this fund well and believe it can be an integral part of your investment strategy, you are free to decide against utilizing the Affiliated ETF or any other investments we may recommend for your portfolio. We also reserve the right to decline working with you both at the beginning of our potential relationship and at any other point in our relationship if we feel we cannot implement the strategy we recommend due to restrictions

you may require or subsequently impose.

Wealth Builder Funds, LLC, is an affiliated advisor of HSW through common control and ownership. As discussed in Item 4 and Item 5, Wealth Builder Funds acts as the sub-advisor to one ETF, the TrueShares Active Yield ETF. A potential conflict of interest exists when we invest your assets into a proprietary fund of an affiliate in that our affiliate will receive a fee on those same assets as described in the Affiliated ETF's prospectus. Specifically, the use of the Affiliated ETF will result in you paying investment management fees to both HSW and Wealth Builder Funds. Because we receive both the fees you pay HSW and the fees you pay our Affiliate for investing in the Affiliated ETF it sub-advises, you should understand that we have an incentive to utilize the Affiliated ETF as part of your overall investment strategy. As previously mentioned, the fees associated with the investment in the Affiliated ETF will be paid to our Affiliate in accordance with the fund's prospectus and the Affiliated Firm's specific investment advisory agreement with the Affiliated ETF. In addition, when invested in the Affiliated ETF, you will indirectly bear your pro rata share of the fees, expenses, and charges described in the fund's prospectus. Such fees, expenses, and charges may include, but are not limited to, investment management fees, shareholder service fees, fees incurred for legal, audit, and custodial services provided to the Affiliate ETF, and the cost of transactions effected for the Affiliated ETF such as brokerage and execution charges, markups, and commissions.

In the future, if other conflicts were to arise regarding our current, or any new financial industry activities or affiliations, including the receipt of compensation from those sources, other than as already disclosed in this document, we would:

- Disclose in this section the existence of those material conflicts of interest, including the potential for HSW and our employees to earn compensation in addition to HSW's stated advisory fees;
- Disclose to you, as we have done in this section, that you are not obligated to purchase recommended investment products from our employees or affiliated companies;
- Require that our employees seek prior approval of any outside employment activity, other than those that have already been outlined herein, so that we may ensure that any conflicts of interest in such activities are properly addressed; and
- Periodically monitor outside employment activities, other than those already identified herein, of our employees to verify that any conflicts of interest continue to be properly addressed by our firm.

ITEM 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

CODE OF ETHICS

Our Firm has adopted a Code of Ethics which sets forth high ethical standards of business

conduct that we require of our employees, including compliance with applicable federal securities laws.

We believe that our Firm and its employees owe a duty of loyalty, fairness and good faith towards all our clients, and have an obligation to adhere not only to the specific provisions of our Code of Ethics but to the general principles that guide the Code of Ethics.

The purpose of our Code of Ethics is to reinforce the fiduciary principles that govern the conduct of our Firm and the actions of our advisory personnel. Each member of the Firm is instructed to act in the best interests of all of our clients, to avoid any real or potential conflicts of interest, and to conduct their personal activities with the utmost of integrity.

Our Code of Ethics has been distributed to all members of the Firm. The following is a summary of the policies contained in our Code of Ethics:

- Standards of Business Conduct
- Compliance with Federal Securities Law
- Review and/or Approval of Personal Securities Transactions by All Employees
- Obligation to Report Violations and Enforcement of Sanctions Where Necessary
- Annual Employee Certification Required if Material Changes Occur

Our Code of Ethics includes policies and procedures for the review of proposed transactions, quarterly securities reporting, initial and annual securities holdings reports that must be submitted by the Firm's access persons, and restrictions on the acceptance of significant gifts, and the reporting of certain levels of gifts and business entertainment items incurred or provided by our personnel. Our Code of Ethics also provides for oversight, enforcement and recordkeeping provisions.

In addition, our Code of Ethics prohibits the use of material non-public information. We do not believe that we have any access to non-public information, however, employees are reminded that such information, if ever received, may not be used in any manner.

You may receive a *free copy* of our Code of Ethics by sending your request to mgwellman@beaconcompliance.com, or by calling us at 913-239-0100.

INTEREST IN CLIENT TRANSACTIONS

Our Firm does not participate in Principal Trades or in Agency Cross transactions. Principal transactions are those where our Firm, acting on behalf of our own account, buys or sells a security to you or another client. An Agency Cross transaction is one in which our Firm acts as a broker for both the buyer and seller of a security.

PERSONAL TRADING

Our Code of Ethics is designed to assure that the personal securities transactions by our employees, and the activities and interests of our employees will not interfere with:

- Making decisions in your best interests; and
- Implementing such decisions while, at the same time, allowing our employees to invest for their own accounts.

Our Firm and employees of our Firm may make recommendations for the purchase or sale of securities that we either may:

- Already have an interest in; or
- Subsequently may invest in.

It is our Firm's policy to require all access persons to obtain pre-clearance from compliance prior to executing a personal securities transaction in any Reportable Fund, initial public offering ("IPO"), and Limited Offering (including Private Placements). Exempted transactions include direct obligations of the United States government, banker's acceptances, bank certificates of deposit, commercial paper, high quality short-term debt instruments, including repurchase agreements, money market funds, and shares issued by any open-end fund other than (i) any investment company registered under the 1940 Act whose investment advisor or principal underwriter is the Firm, controls the Firm, is controlled by the Firm, or is under common control with the Firm. This policy generally prevents the employee(s) from benefiting from transactions placed on behalf of your account(s).

Our Firm and our employees of the Firm may buy or sell for their personal accounts securities identical to or different from those recommended to you. In addition, any related person(s) may have an interest or position in securities which may also be recommended to you or which you may already own.

It is the written policy of our Firm that no person employed by us may purchase or sell any security first if a trade in the same security is being executed for your account.

There also may be instances in which your trade may be with one custodian and the employee's trade is to be executed with a different custodian. In these cases, as stated above, we will make sure that your trade is executed first before that of any of our employees.

As situations like these represent actual or potential conflicts of interest to you, we have established the following policies and procedures as part of our Code of Ethics to ensure we comply with our regulatory obligations and to provide you, other clients, and other potential clients, with full and fair disclosure of such conflicts or potential conflicts of interest:

- Access persons are required to complete and submit a trade request form in advance of the execution of transactions in securities requiring pre-approval. The trade request form

asks whether, to the best of the individuals' knowledge, the Firm has or plans on entering trades in any of the securities the individual is wishing to transact in within the past two days or next two days, respectively.

- No principal or employee of our Firm may put his or her own interest above the interest of your account(s).
- No principal or employee of our Firm may buy or sell securities for their personal portfolio(s) where their decision is based on information received because of his or her employment unless the information is available to the investing public.
- We require prior approval for any IPO, limited offering, or private placement investments by any employee or related persons of the Firm.
- Any individual who violates any of the above restrictions may be subject to varying levels of disciplinary action, including termination.
- We will maintain all records regarding personal securities transactions as is detailed in Rule 204A-1 of the Investment Advisors Act of 1940.

As previously disclosed in Item 5 and Item 10, HSW has Affiliated Advisors, and an Affiliated ETF. This creates an actual conflict of interest when we invest your assets into a proprietary fund of an affiliate in that our affiliate will receive a fee on those same assets as described in that fund's prospectus. Please reference Item 5 and/or Item 10 for more details.

RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS

HSW and its supervised persons may have material financial interests in issuers of securities that HSW may recommend for purchase or sale by clients.

For example, Brian Atkins is 100% owner of Atkins & Associates, LLC. Atkins & Associates is the general partner of one exempt hedge fund; Global Currency Reserve, LP; a fund of funds. Heritage Strategic Wealth, LLC does not manage Global Currency Reserve, LP. However, HSW will recommend investments in these private funds to those clients for which investment in the fund is suitable. Also, related persons of HSW may invest in the funds personally while also recommending clients invest in the funds.

This presents a conflict of interest in that HSW or its related persons may receive more compensation from investment in a security in which HSW or a related person has a material financial interest than from other investments. HSW always acts in the best interest of the client consistent with its fiduciary duties and clients are not required to invest in such investments if they do not wish to do so. Additionally, all Access Persons are required to request and obtain pre-approval for any prospective transaction in the Affiliated ETF.

As previously disclosed in Item 10, Brian Atkins, an investment adviser representative of HSW, is individually compensated as an Associated Person of Wiens Walk. While HSW does not

receive compensation in connection with client participation in futures accounts facilitated by Wiens Walk and maintained at RJ O'Brien, this arrangement may present a potential conflict of interest.

Futures investments involve unique risks and are not suitable for all clients. HSW will only recommend such strategies when it determines they are suitable based on a variety of factors, including, but not limited to, the client's individual circumstances, investment objectives, and risk tolerance.

HSW seeks to mitigate potential conflicts by making recommendations it believes are suitable for the client and by disclosing that Mr. Atkins is compensated in connection with his role at Wiens Walk. Furthermore, clients are under no obligation to open or maintain a futures account, and if they do choose to do so, they may select a different firm at their discretion. HSW is not involved in that process and does not assume responsibility for any third-party firms.

ITEM 12. BROKERAGE PRACTICES

FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER/DEALERS

Custodians/broker-dealers will be recommended based on HSW'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 HSW 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 HSW's research efforts. HSW will never charge a premium or commission on transactions beyond the actual cost imposed by the broker-dealer/custodian.

HSW will require clients to use Charles Schwab & Co., Inc. Advisor Services.

RESEARCH AND OTHER SOFT-DOLLAR BENEFITS

HSW does not maintain any third-party soft dollar arrangements or agreements with any broker-dealer. However, we may receive research and services from the broker-dealers utilized by HSW, that, while not covered in a soft dollar agreement, nonetheless may be a benefit to our Firm.

BROKERAGE FOR CLIENT REFERRALS

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

CLIENTS DIRECTING WHICH BROKER/DEALER/CUSTODIAN TO USE

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

ITEM 13. REVIEW OF ACCOUNTS

FREQUENCY AND NATURE OF PERIODIC REVIEWS AND WHO MAKES THOSE REVIEWS

All client accounts for HSW's advisory services provided on an ongoing basis are reviewed at least annually by Brian Atkins, Owner, with regard to clients' respective investment policies and risk tolerance levels. All accounts at HSW are assigned to this reviewer.

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).

CONTENT AND FREQUENCY OF REGULAR REPORTS PROVIDED TO CLIENTS

Each client of HSW's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

ECONOMIC BENEFITS PROVIDED BY THIRD PARTIES FOR ADVICE RENDERED TO CLIENTS (INCLUDES SALES AWARDS OR OTHER PRIZES)

Charles Schwab & Co., Inc. Advisor Services provides HSW with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For HSW client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to HSW other products and services that benefit HSW but may not benefit its clients' accounts. These benefits may include national, regional or HSW specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of HSW by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist HSW in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of HSW's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of HSW's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to HSW other services intended to help HSW manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to HSW by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to HSW. HSW is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

COMPENSATION TO NON-ADVISORY PERSONNEL FOR CLIENT REFERRALS

HSW may, from time to time enter into agreements with third-party promoters (formerly referred to as solicitors) to whom we provide compensation for securing clients for us. These agreements require that the promoters meet the disclosure requirements and disqualification provisions in accordance with Prong 2 of the Investment Adviser Marketing Rule 206(4)-1 under the Investment Advisers Act of 1940. At the time of the initial solicitation, the solicited client will receive a copy of HSW's promoter disclosure brochure, which includes information such as the nature of the relationship between HSW and the promoter and any conflicts of interest. Additionally, prior to, or at the time of, entering into an investment management agreement with HSW, the solicited client will receive HSW's Form ADV Part 2A, Privacy Policy, and Form ADV Part 3-CRS, as may be applicable.

The compensation paid to a promoter may vary and is detailed in the agreement and the promoter disclosure brochure and is generally based upon a percentage of the fees earned by HSW from clients solicited through such third-party promoter. Compensation paid to a

promoter will not increase the amount of management fees charged to a client.

ITEM 15. CUSTODY

We previously disclosed in the “Fees and Compensation” section (Item 5) of this Brochure that we request you direct your custodian to allow our Firm to directly debit your management fees from your account(s). However, as previously stated, it is your option to authorize this process, and if you do not approve of the direct deduction from your account, we will submit periodic invoices directly to you or the custodian, as you request.

Technically, SEC rules consider the action of direct debiting of fees to be considered maintaining custody. However, if this is the only manner in which we are considered to have custody and certain conditions are met, we will not be subject to the requirements established for true custody of your assets.

If you agree to allow us to direct debit fees from your account(s), we will require authorization in writing from you. Each billing period we will notify your custodian of the amount of the fee to be deducted from your account(s). On at least a quarterly basis, the custodian is required to send to you and us a statement showing all transactions, including management fees disbursed from your account during the reporting period.

It is important you carefully review the custodial statements to verify the accuracy of the calculation, among other things. You should contact us directly if you believe there may be an error in your statement.

In addition to the periodic statements that you receive directly from your custodian, we may send or provide, via electronic format, account statements directly to you.

Our Firm does not have physical custody of any client assets.

ITEM 16. INVESTMENT DISCRETION

HSW provides 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, HSW 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. In some instances, HSW’s discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to HSW).

ITEM 17. VOTING CLIENT SECURITIES (PROXY VOTING)

HSW 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

HSW does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance. In addition, HSW is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. HSW has no disclosures pursuant to this Item.



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