

**DISCLOSURE BROCHURE**  
PREPARED IN COMPLIANCE WITH  
THE INVESTMENT ADVISERS ACT OF 1940 RULE 204-3(A)



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This brochure provides information about the qualifications and business practices of STRIDE Investments, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 773-572-2386. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about STRIDE Investments, LLC (CRD #167037) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. In accordance with amendment requirements, the firm is filing an updated Form ADV Part 1

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### **Material Changes since the Last Update**

This update is in accordance with the required annual update for Investment Advisor Representatives. Since the last filing on February 25, 2021, the following has changed:

- Item 4 has been updated to reflect the assets under management for the firm as of year-end.
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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

**Item 3: Table of Contents**  
**Form ADV – Part 2A – Firm Brochure**

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## Item 4: Advisory Business

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### Firm Description

STRIDE Investments, LLC (STRIDE) formerly known as At World Investments, LLC was founded in 2013. Samuel A. McElroy, Tad Cook, and Patricia McElroy are owners of the firm. Samuel A. McElroy is the Chief Compliance Officer.

STRIDE offers *personalized* investment management to all clients. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning. Each client's situation will determine the investment recommendation and may vary from client to client. STRIDE does not require a minimum account size to offer its services.

STRIDE is a fee based investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm's Chief Compliance Officer is affiliated with STRIDE, LLC and as an insurance agent, may sell insurance products to clients.

Investment advice is provided with the client making the final decision on investment selection. STRIDE does not act as a custodian of client assets.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. For example, tax preparation and to the extent your estate plan needs to be updated, the tax preparer and/or attorney will bill the client separately. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

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### Types of Advisory Services

#### ASSET MANAGEMENT

STRIDE offers discretionary and non-discretionary direct asset management services. STRIDE will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

#### Discretionary

When the client provides STRIDE discretionary authority the client will sign a limited trading authorization or equivalent. STRIDE will have the authority to execute transactions in the account without seeking client approval on each transaction.

When deemed appropriate for the client, STRIDE may hire sub-advisors to manage all or a portion of the assets in the client account. STRIDE has full discretion to hire and fire sub-advisors as they deem suitable. Sub-advisors will maintain the models or investment strategies agreed upon between sub-advisor and STRIDE. Sub-advisors execute all trades on behalf of STRIDE in client accounts. STRIDE will be responsible for the overall direct

relationship with the client. STRIDE retains the authority to terminate the sub-advisor relationship at STRIDE's discretion.

#### Non-discretionary

When the client elects to use STRIDE on a non-discretionary basis, STRIDE will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, STRIDE will obtain prior client approval on each and every transaction before executing any transactions.

#### ERISA PLAN SERVICES

STRIDE provides service to qualified and non-qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans.

**Limited Scope ERISA 3(21) Fiduciary.** STRIDE typically acts as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions on a non-discretionary basis. As an investment advisor STRIDE has a fiduciary duty to act in the best interest of the client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using STRIDE can help the plan sponsor delegate liability by following a diligent process.

#### 1. Fiduciary Services are:

- Provide non-discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options.
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide non-discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.
- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.

#### 2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands the Advisor's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such,

the Advisor is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. Advisor will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.

- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

Advisor may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Advisor and Client.

3. The Advisor has no responsibility to provide services related to the following types of assets ("Excluded Assets"):
  1. Employer securities;
  2. Real estate (except for real estate funds or publicly traded REITs);
  3. Stock brokerage accounts or mutual fund windows;
  4. Participant loans;
  5. Non-publicly traded partnership interests;
  6. Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
  7. Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to the Advisor under this Agreement.

Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

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### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

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### **Wrap Fee Programs**

STRIDE does not sponsor any wrap fee programs.

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### **Client Assets under Management**

As of December 31, 2021, STRIDE had approximately \$101,347,000 in assets under management on a discretionary basis and \$54,950,000 in assets under management on a non-discretionary basis.

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## **Item 5: Fees and Compensation**

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### **Method of Compensation and Fee Schedule**

STRIDE bases its fees on a percentage of assets under management and sub-advisor fees.

#### ASSET MANAGEMENT WITHOUT SUB-ADVISORS

When STRIDE offers discretionary or non-discretionary authority without electing to utilize a sub-advisor, the annual fee will not exceed 0.90% of the assets under management.

Fees are billed quarterly in advance based on the market value of assets managed on the last business day of the immediately preceding quarter. Initial billing for new accounts will also include a pro-rated amount from the day the account is opened to the end of the quarter in which the account was opened. Quarterly advisory fees will either be deducted from the clients' account by the custodian or paid directly by the client. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days written notice. Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

#### DISCRETIONARY ASSET MANAGEMENT WITH SUB-ADVISORS

From time to time, STRIDE may also utilize the services of a sub-advisor to manage clients' investment portfolios. STRIDE will enter into sub-advisor agreements with other registered investment advisor firms, under which STRIDE will pay a fee to that firm for investment management services. When using sub-advisors, the client will not pay additional fees. The sub-advisors' fees are included in the fees charged by STRIDE.

##### SOUND INCOME STRATEGIES, LLC

STRIDE offers discretionary direct asset management services to advisory clients. Fees for these services will be based on a percentage of Assets Under Management at a rate of .75% annually. From time to time, STRIDE may also utilize the services of sub-advisor, Sound Income Strategies, LLC, to manage clients' investment portfolios.

The annual Fee may be negotiable.

Fees are billed quarterly in advance based on the market value of assets managed on the last business day of the immediately preceding quarter. Initial billing for new accounts will also include a pro-rated amount from the day the account is opened to the end of the quarter in which the account was opened. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected in a provided fee invoice as fees are withdrawn. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. If cancellation occurs after five (5) business days, client will be entitled to a pro rata refund for the days service was not provided in the final quarter.

Clients may terminate advisory services with thirty (30) days written notice. The client will be entitled to a pro rata refund for the days service was not provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

##### POLARIS GREYSTONE FINANCIAL GROUP, LLC

STRIDE offers discretionary direct asset management services to advisory clients. Fees for these services will be based on a percentage of Assets Under Management at a rate of .90% annually. From time to time, STRIDE may also utilize the services of sub-advisor, Polaris Greystone Financial Group, LLC, to manage clients' investment portfolios.

The annual Fee may be negotiable. Accounts within the same household may be combined for a reduced fee.

Fees are billed quarterly in advance based on the market value of assets managed on the last business day of the immediately preceding quarter. Initial billing for new accounts will also include a pro-rated amount from the day the account is opened to the end of the quarter in which the account was opened. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected in a provided fee invoice as fees are withdrawn. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. If cancellation occurs after five (5) business days, client will be entitled to a pro rata refund for the days service was not provided in the final quarter.

Clients may terminate advisory services with thirty (30) days written notice. The advisor will be entitled to a pro rata fee for the days service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

In addition, Polaris Greystone Financial Group, LLC may require an annual minimum account fee.

#### ERISA PLAN SERVICES

The annual fee is a flat fee of \$50 per employee account, which is charged quarterly in the amount of \$12.50. This flat fee is charged regardless of account size and is charged in arrears. If an account is opened mid-quarter, it will be billed the full \$12.50 for that quarter. However, if the account is terminated prior to the end of the fee period, the client will not be billed for that billing cycle.

The compensation of STRIDE for the services is described in detail in Schedule A of the ERISA Plan Agreement. The fees will be billed directly to the client's account. STRIDE does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, STRIDE will disclose this compensation, the services rendered, and the payer of compensation. STRIDE will offset the compensation against the fees agreed upon under this Agreement.

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#### **Client Payment of Fees**

Investment management fees are billed quarterly, in advance, meaning you pay the fees at the beginning of the three-month billing period. Fees are deducted from a designated client account by the custodian. The client must consent in advance to direct debiting of their investment account.

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#### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations). The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

STRIDE, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

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**Prepayment of Client Fees**

Investment management fees are billed quarterly in advance. Client may cancel within five (5) business days of signing the Investment Advisory Agreement for a full refund. If cancellation occurs after five (5) business days, client will be entitled to a pro-rata refund based on work completed.

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**External Compensation for the Sale of Securities to Clients**

STRIDE does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of STRIDE.

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**Item 6: Performance-Based Fees and Side-by-Side Management**

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**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

STRIDE does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

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**Item 7: Types of Clients**

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**Description**

STRIDE generally provides investment advice to individuals, high net worth individuals and corporations or business entities.

Client relationships vary in scope and length of service.

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**Account Minimums**

STRIDE does not require a minimum to open an account. The sub-advisors utilized by STRIDE may have minimums to open accounts.

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

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**Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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**Investment Strategy**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Option transactions are not suitable for all persons and clients should be aware of the risks involved. The risks involved are credit risk, market risk, funding risk, and operational risk. Clients will receive a separate disclosure from the custodian on the risks associated with standardized options.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with STRIDE:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

- *Funding Risk*: The risk that, as a result of mismatches or delays in the timing of cash flows due from or to the client or counterparty in the transactions, the client or counterparty may not have adequate cash available to fund current obligations.
- *Operational Risk*: The risk of loss to the client arising from inadequacies in or failures of system and controls for, monitoring and quantifying the risks and contractual obligations associated the transactions, for recording and valuing the transactions, or for detecting human errors or systems failures.
- *Credit Risk*: The risk of loss of principal stemming from a borrower's failure to repay a loan or otherwise meet a contractual obligation.

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## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

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### **Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

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## **Item 10: Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer or Representative Registration**

Neither STRIDE nor any of its employees are affiliated with a broker-dealer.

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### **Futures or Commodity Registration**

Neither STRIDE nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Samuel A. McElroy has financial industry affiliated business as an insurance agent. More than 50% of his time is spent in this practice, he offers clients advice or products from those activities. Clients are not required to purchase any products.

This represents a conflict of interest because it gives Mr. McElroy an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the interests of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

STRIDE may at times, when deemed appropriate for the client, hire sub-advisors to manage all or a portion of the client account. Fees for the sub-advisor are included in the fee charged by STRIDE to the client. STRIDE has the discretion to hire and fire sub-advisors of their choosing.

In addition to the authority granted to STRIDE under the Agreement, Client hereby grants STRIDE full discretionary authority and authorizes STRIDE to select and appoint one or

more independent investment advisors (“Advisors”) to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such advisory services will be as determined by STRIDE. Such Advisors shall have all of the same authority relating to the management of Client’s investment accounts as is granted to STRIDE in the Agreement. In addition, at STRIDE’s discretion, STRIDE may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors.

This practice represents a conflict of interest as STRIDE may select sub-advisors who charge a lower fee for their services than other sub-advisors. This conflict is mitigated by disclosures, procedures, and the firm’s Fiduciary obligation and to place the best interest of the client first and will adhere to their code of ethics. When referring clients to a sub-advisor the client’s best interest will be the main determining factor of STRIDE.

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

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### **Code of Ethics Description**

The employees of STRIDE have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of STRIDE employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of STRIDE. The Code reflects STRIDE and its supervised persons’ responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

STRIDE’s policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of STRIDE may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

STRIDE’s Code is based on the guiding principle that the interests of the client are our top priority. STRIDE’s officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client’s interests over the interests of either employees or the company.

The Code applies to “access” persons. “Access” persons are employees who have access to non-public information regarding any clients’ purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

STRIDE and its employees do not recommend to clients securities in which we have a material financial interest.

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**Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

STRIDE and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running of client trades, employees are required to disclose all reportable securities transactions as well as provide STRIDE with copies of their brokerage statements.

The Chief Compliance Officer of STRIDE is Samuel A. McElroy. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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**Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

STRIDE does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide STRIDE with copies of their brokerage statements.

The Chief Compliance Officer of STRIDE is Samuel A. McElroy. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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**Item 12: Brokerage Practices**

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**Factors Used to Select Broker-Dealers for Client Transactions**

STRIDE may recommend the use of a particular broker-dealer such as TD Ameritrade Institutional, a Division of TD Ameritrade, Inc., member FINRA/SIPC or may utilize a broker-dealer of the client's choosing. STRIDE will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. STRIDE relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by STRIDE.

STRIDE participates in the TD Ameritrade Institutional program. TD Ameritrade, Inc. ("TD Ameritrade") is an independent SEC-registered broker-dealer and is not affiliated with STRIDE. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. STRIDE receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14.)

- *Directed Brokerage*

In circumstances where a client directs STRIDE to use a certain broker-dealer, STRIDE still has a fiduciary duty to its clients. The following may apply with Directed

Brokerage: STRIDE's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients, and conflicts of interest arising from brokerage firm referrals.

- *Best Execution*  
Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.
- *Soft Dollar Arrangements*  
STRIDE utilizes the services of custodial broker dealers. Economic benefits are received by STRIDE which would not be received if STRIDE did not give investment advice to clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to STRIDE's accounts, electronic download of trades, balances and positions, duplicate and batched client statements, and the ability to have advisory fees directly deducted from client accounts.

A conflict of interest exists when STRIDE receives soft dollars. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to act in the best interest of his clients and the services received are beneficial to all clients.

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### **Aggregating Securities Transactions for Client Accounts**

STRIDE is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of STRIDE. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

## **Item 13: Review of Accounts**

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### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by Samuel A. McElroy, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate.

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### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

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### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the STRIDE's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

## **Item 14: Client Referrals and Other Compensation**

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### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

As disclosed under Item 12. above, STRIDE participates in TD Ameritrade's institutional customer program and STRIDE may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between STRIDE's participation in the program and the investment advice it gives to its Clients, although STRIDE receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving STRIDE participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to STRIDE by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by STRIDE's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit STRIDE but may not benefit its Client accounts. These products or services may assist STRIDE in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help STRIDE manage and further develop its business enterprise. The benefits received by STRIDE or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, STRIDE endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by STRIDE or its related persons in and of itself creates a conflict of interest and may indirectly influence the STRIDE's choice of TD Ameritrade for custody and brokerage services.

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### **Advisory Firm Payments for Client Referrals**

STRIDE does not compensate for client referrals.

## **Item 15: Custody**

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### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by STRIDE.

STRIDE is deemed to have constructive custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of STRIDE.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

STRIDE accepts discretionary authority to manage securities accounts on behalf of clients. STRIDE has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, STRIDE consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

When STRIDE engages a sub-advisor, STRIDE accepts discretionary authority to manage securities accounts on behalf of clients. STRIDE has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. STRIDE does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

STRIDE does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, STRIDE will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided because STRIDE does not serve as a custodian for client funds or securities and STRIDE does not require prepayment of fees of more than \$1200 per client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

STRIDE has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions during the Past Ten Years**

Neither STRIDE nor its owner has any bankruptcies to report.

**SUPERVISED PERSON BROCHURE  
FORM ADV PART 2B**

**SAMUEL A. MCELROY**



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**FEBRUARY 7, 2022**

This brochure supplement provides information about Samuel A. McElroy and supplements the STRIDE Investments, LLC brochure. You should have received a copy of that brochure. Please contact Samuel A. McElroy if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Samuel A. McElroy (CRD #6166318) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Brochure Supplement (Part 2B of Form ADV)**

### **Supervised Person Brochure**

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#### **Principal Executive Officer**

**Samuel A. McElroy**

- Year of birth: 1983
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#### **Item 2 Educational Background and Business Experience**

Educational Background:

- Hampton University; Bachelor of Arts – Sociology; 2006
- Illinois School of Professional Psychology – Doctorate in Clinical Psychology; 2013

Business Experience:

- STRIDE Investments, LLC formerly At World Investments, LLC; Member/Chief Compliance Officer/Investment Advisor Representative; 02/2013 - Present
  - STRIDE Financial, LLC; Member/Chief Operations Officer; 06/2011 - Present
  - McElroy Financial; Owner/Insurance Agent; 11/2006 – 12/2013
  - CareerBuilder, LLC; Sales Associate; 05/2006 - 02/2007
  - Full-time Student; 09/2000 – 05/2006
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#### **Item 3 Disciplinary Information**

None to report.

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#### **Item 4 Other Business Activities**

Samuel A. McElroy has financial industry affiliated businesses as an insurance agent. More than 50% of his time is spent in this practice, he offers clients advice or products from those activities. Clients are not required to purchase any products.

These practices represent conflicts of interest because it gives Mr. McElroy an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the interests of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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#### **Item 5 Additional Compensation**

Samuel A. McElroy receives compensation in his capacity as the Chief Operations Officer for STRIDE Financial, LLC and commission from the sale of insurance products, but he does not receive any performance-based fees.

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#### **Item 6 Supervision**

Since Samuel A. McElroy is the Chief Compliance Officer of STRIDE Investments, LLC, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.