

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 312-767-9166. 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

Item 2: Material Changes

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

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 27, 2023, the following has changed:

- Item 4 has been updated to describe the differences between STRIDE Investments and STRIDE Financial. We explain that financial planning and insurance services are provided through STRIDE Financial and asset management services are provided through STRIDE Investments.
- Item 4 and Item 10 were also updated to include additional, specific disclosures related to conflicts of interest when we recommend insurance products through STRIDE Financial.
- Item 4 was updated to better describe and detail our asset management services.
- We have added new disclosures regarding our recommendations and advice related to retirement plan rollovers.
- Item 4 has been updated to reflect the assets under management for the firm as of year-end.
- Item 5 was updated to increase the maximum fee we charge for asset management services to not exceed 0.90% annually. Existing clients as of March 2024, were grandfathered on their old, less expensive fee schedules.
- If we select sub-advisers to assist with the management of client accounts, the selected sub-adviser will receive a portion of the 0.90% annual fee therefore the portion of the overall fee we receive varies based on the sub-adviser selected.
- Item 5 has been updated to reflect our fee schedules and procedures for ERISA Plan Services.
- Item 8 has been updated to reflect our current investment strategies and methods of analysis along with the risks associated with each strategy and method of analysis.

- Item 10 was also updated to disclose that two of our owners hold a small minority ownership interest in Sound Income Group, LLC, the parent company of Sound Income Strategies, LLC, one of the sub-advisers we recommend to clients.
- Item 12 has been updated to remove TD Ameritrade and disclose the benefits, services and tools we receive from Charles Schwab & Company, Inc. In November 2019, the two firms announced they had entered into a definitive agreement for Charles Schwab & Company, Inc. to acquire TD Ameritrade in all-stock transaction. As a result of that acquisition, accounts previously held at TD Ameritrade are now Charles Schwab & Company, Inc. accounts.
- Additionally, updates were made to Item 12 to further describe our policies and procedures for aggregating securities transaction for client accounts.
- Item 13 was updated to explain STRIDE Investments can provide written performance and position reports to clients when requested and during client meetings. You are encouraged to always compare any reports or statements provided by us against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.
- Item 14 was updated to describe and detail the fees assessed by STRIDE Financial for the non-investment related financial planning and consulting services provided through that company. Additionally, disclosure of the additional compensation and incentives for insurance products sold through STRIDE Financial has been added to the section.
- Item 15 has been updated to better describe our policies and procedures related to using qualified custodians to hold separate accounts for all client funds and securities.
- Item 16 was updated to better describe the difference between discretionary services and services provided on a non-discretionary basis. We also explain how we can select unaffiliated sub-advisers on a discretionary basis.
- Finally, Item 17 was updated to reflect our current procedures related clients needing to vote proxies for their accounts and how to find information for proxy-voting policies and procedures of unaffiliated sub-advisers.

Full Brochure Available

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

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Form ADV – Part 2A – Firm Brochure

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Item 4: Advisory Business

Firm Description

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

STRIDE Investments offers *personalized* investment management to all clients. Each client's situation will determine the investment recommendation and may vary from client to client.

STRIDE Investments is a fee based investment management firm. STRIDE Investments does not act as a custodian of client assets.

The investment advisory services of STRIDE Investments are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of STRIDE Investments (referred to as your investment adviser representative throughout this brochure). An evaluation of each client's initial situation is provided to the client, often in the form of a proprietary report referred to as a Retirement Income Summary, which may include a net worth statement, cash flow assessment, 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. For the majority of these situations, the third-party professional will bill the client directly and the client will be responsible for paying fees to the third-party. However, in some instances STRIDE Financial or STRIDE Investments will act as a liaison between other professionals and the client to assist in the collection and remittance of fees to other professionals.

We primarily market our collective services under the brand-name of "STRIDE Financial". STRIDE Investments is affiliated with and under common ownership with STRIDE Financial LLC. Therefore, clients of STRIDE Investments can also be and commonly are clients of STRIDE Financial LLC.

STRIDE Financial provides a suite of financial planning, consulting and insurance services. All such services are non-investment related because all "investment advisory services" (i.e., investment recommendations, investment analysis and consulting related to investments and securities) are provided through STRIDE Investments. Services provided by STRIDE Financial include, but are not limited to, the following:

- Retirement Planning
- Financial Planning (non-investment related)
- Social Security Maximization
- Estate Planning
- Tax Planning
- College Planning
- Business Planning

- Life Insurance
- Annuities
- Health Insurance
- Property and Casualty Insurance
- Long-Term Care Insurance
- Disability Insurance

The preceding services provided by STRIDE Financial are offered on a fixed-fee basis unless STRIDE Financial decides to waive its fee and provide services on a complimentary basis. To the extent that you personally engage STRIDE Financial, you will be responsible for the payment of the fees for their services. Fees for the services of STRIDE Financial will be in addition to and separate from the fees charged by STRIDE Investments. In no event will any fees for services through STRIDE Financial be owed without your express approval.

As a client of STRIDE Investments, your investment adviser representative or a different investment adviser representative can also serve as an insurance agent under STRIDE Financial, which is an insurance agency. This means your investment adviser representative, acting as an insurance agent, will recommend you place your assets in insurance products and annuities when he or she believes it is in your best interest to do so.

Insurance products and annuities pay commissions to STRIDE Financial and to the owners and investment adviser representatives of STRIDE Investments in their separate capacity as insurance agents. This presents a conflict of interest to your investment adviser representative as he or she will be more inclined to recommend you place your assets in either insurance products or an advisory account depending on which would pay us more.

STRIDE Investments has taken steps to manage this conflict of interest by requiring that each investment adviser representative (i) only recommend insurance and annuities when in the best interest of the client and without regard to the financial interest of STRIDE Investments, its owners and its investment adviser representative or STRIDE Financial and its insurance agents, and (ii) not recommend insurance and/or annuities which result in your investment adviser representative acting as an insurance agent and/or STRIDE Investments or STRIDE Financial receiving unreasonable compensation related to the recommendation and (iii) disclosing in writing to a client any material conflicts of interest related to insurance recommendations.

Types of Advisory Services

ASSET MANAGEMENT

STRIDE Investments offers asset management services, which involves STRIDE Investments providing you with continuous and ongoing supervision over your specified accounts.

You must appoint our firm as your investment adviser of record on specified accounts (collectively, the "Account"). The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account. Refer to Item 12 – Brokerage Practices for more information.

The Account is managed by us based on your financial situation, investment objectives and risk tolerance. We actively monitor the Account and implement advice by buying, selling, reinvesting or holding securities, cash or other investments of the Account.

We will need to obtain certain information from you to determine your financial situation and investment objectives. In the process of obtaining the information from you, we provide ancillary financial planning and consultative services including asset allocation, risk management and income planning. Such financial planning and consultative services are intended to better understand your financial situation and design an investment portfolio consistent with your long-term needs and goals.

You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objective and whether you wish to impose or modify existing investment restrictions; however we will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

STRIDE Investments offers discretionary and non-discretionary direct asset management services. 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 Investments discretionary authority the client will sign a limited trading authorization or equivalent. STRIDE Investments will have the authority to execute transactions in the account without seeking client approval on each transaction.

Clients can grant STRIDE Investments discretionary authority to select one or more unaffiliated third-party investment adviser firms to serve as sub-advisors. This will allow STRIDE Investments, when deemed appropriate for the client, to hire sub-advisors to manage all or a portion of the assets in the client account. STRIDE Investments 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 Investments. Sub-advisors execute all trades on behalf of STRIDE Investments in client accounts. STRIDE Investments will be responsible for the overall direct relationship with

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

Non-discretionary

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

ERISA PLAN SERVICES

STRIDE Investments 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 Investments 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 Investments 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 Investments 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. STRIDE Investments 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.

STRIDE Investments 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.

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

Retirement Plan Rollover Recommendations

When STRIDE Investments provides investment advice about your retirement plan account or individual retirement account ("IRA") including whether to maintain investments and/or proceeds in the retirement plan account, roll over such investment/proceeds from the retirement plan account to a IRA or make a distribution from the retirement plan account, we acknowledge that STRIDE Investments is a "fiduciary" within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC") as applicable, which are laws governing retirement accounts. The way STRIDE Investments makes money creates conflicts with your interests so STRIDE Investments operates under a special rule that requires STRIDE Investments to act in your best interest and not put our interest ahead of you.

Under this special rule's provisions, STRIDE Investments must as a fiduciary to a retirement plan account or IRA under ERISA/IRC:

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

To the extent we recommend you roll over your account from a current retirement plan account to an individual retirement account managed by STRIDE Investments, please know that STRIDE Investments and our investment adviser representatives have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to an IRA managed by STRIDE Investments. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to an IRA managed by STRIDE Investments.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to an IRA which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our economic incentive and not based exclusively on whether or not moving the IRA to our management program is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in STRIDE Investments receiving unreasonable compensation related to the rollover of funds from the retirement plan to an IRA, and (iii) fully disclose compensation received by STRIDE Investments and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

When providing advice to a retirement plan account or IRA, our investment adviser representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of STRIDE Investments or our affiliated personnel.

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.

STRIDE Investments's advisory services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

Wrap Fee Programs

A wrap-fee program is defined as any advisory program under which a specified fee or fees not based directly upon transactions in a client's account is charged for investment advisory services (which include portfolio management and/or advice concerning the selection of other investment advisers) and the execution of client transactions. We do not offer or participate in wrap-fee programs. All of our services are provided on a non-wrap fee basis which means fees and expenses for execution of client transactions charged by your broker/dealer and/or custodian are billed directly to your account separately from our advisory fees.

Client Assets under Management

As of December 31, 2023, STRIDE Investments had approximately \$98,762,000 in assets under management on a discretionary basis and \$43,471,000 in assets under management on a non-discretionary basis for a total of \$173,831,969.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

STRIDE Investments charges fees based on a percentage of assets under management and sub-advisor fees.

ASSET MANAGEMENT WITHOUT SUB-ADVISORS

When STRIDE Investments 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

When appropriate and in the best interest of individual clients, STRIDE Investments can also utilize the services of a sub-advisor to manage clients' investment portfolios. STRIDE Investments will enter into sub-advisor agreements with other registered investment advisor firms, under which STRIDE Investments 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 Investments. This creates a conflict of interest in that there is an economic incentive for STRIDE Investments and its investment adviser representatives to recommend sub-advisors and/or strategies which have a lower fee rate or schedule compared to other sub-advisors and/or strategies with a higher fee rate or schedule because when the lower fee rate or schedule is selected, we retain a higher portion of the overall fee assessed to the client. STRIDE Investments has taken steps to manage the conflict of interest arising from its use of sub-advisors with different fee rates/schedules by implementing policies and procedures to make sub-advisor recommendations based on the best interest of the client and without regard to the financial interest of STRIDE Investments.

SOUND INCOME STRATEGIES, LLC

STRIDE Investments 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 that will not exceed 0.90% annually. From time to time, STRIDE Investments 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 Investments 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 Investments may also utilize the services of sub-adviser, 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

For retirement plan sponsor clients, STRIDE Investments charges an annual fee of 0.50% that is calculated as a percentage of the value of plan assets. This fee is negotiable based upon the complexity of the plan, the size of the plan assets and the actual services requested.

Retirement plan fees are billed in advance (at the start of the billing period) on a quarterly calendar basis and calculated based on the fair market value of the plan as of the last day of the previous billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for services that commence at any time other than the beginning of the billing period.

Clients can elect to have the fee deducted from the plan or billed directly and due upon receipt of the billing notice. If clients elect to have the fee automatically deducted from the plan, they are required to provide the custodian with written authorization to deduct the fees from Plan assets and pay the fees to STRIDE Investments. We will provide the custodian with a fee notification statement.

You may terminate the services upon providing STRIDE Investments with notice. We may terminate the services upon providing you with written notice effective upon 30 days after you receive the written notice. If services are terminated within five business days of signing the client agreement, services are terminated without penalty. Any prepaid but unearned fees are promptly refunded to the client at the effective date of termination.

STRIDE Investments does not reasonably expect to receive any other compensation, direct or indirect, for its Services. If we receive any other compensation for such services, we will (i) offset that compensation against our stated fees, and (ii) will disclose the amount of such compensation, the services rendered for such compensation and the payer of such compensation to you.

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.

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 Investments, 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.).

Effective March 2024, STRIDE Investments raised the maximum standard fee charged to new clients. Existing clients as of March 2024, were grandfathered on their old, less expensive fee schedules.

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

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.

External Compensation for the Sale of Securities to Clients

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

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

Sharing of Capital Gains

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

STRIDE Investments 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.

Item 7: Types of Clients

Description

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

Client relationships vary in scope and length of service.

Account Minimums

STRIDE Investments does not require a minimum to open an account. Minimums required by sub-advisors utilized by STRIDE Investments will be disclosed to the client in a separate disclosure at the time the sub-advisor is selected

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

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.

Purpose Based Investing

Purpose-based investing takes a unique approach, prioritizing your specific goals over simply maximizing returns. It categorizes your goals into three categories:

1. **Lump-sum focused:** These are goals like a down payment on a house or funding a specific project.
2. **Income focused:** These goals require generating ongoing cash flow, like retirement income or supporting a cause.
3. **Maximizing net-after-tax wealth transfers:** This focuses on minimizing tax implications when passing assets to heirs.

Instead of fixating on high returns alone, this method analyzes key ratios tied to your goals, like:

- **Cash flow:** Examining dividends and interest generated, ensuring enough income to fund your needs without selling assets.
- **Risk capacity:** This defines your ability to handle investment losses based on your financial situation.
- **Risk efficiency:** Analyzing investments based on how well they achieve your goals relative to their risk level.

While traditional methods might prioritize total return, purpose-based investing prioritizes:

- **Risk tolerance:** Your emotional comfort with different levels of investment volatility.
- **Risk capacity:** Often weighted more heavily, ensuring your investments align with your ability to absorb losses.
- **Net Yield:** The amount of income that can be withdrawn from assets without having to sell the asset in order to convert it to cash.

The risk associated with a purpose-based investment analysis is that the focus on specific goals and the key ratios associated with measuring progress towards those goals might cause portfolios to trail benchmarks focused more on Total Return. In addition to this, while Risk Tolerance is a key factor in the portfolio creation, Risk Capacity may skew portfolios to become more or less aggressive than the client's emotional response to volatility in an effort to be more aligned with plan outcomes.

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. This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

Technical analysis involves evaluating securities based on past prices and volume. This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic

value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

Cyclical analysis involves analyzing the cycles of the market. This method analyzes the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and in higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins, and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

While most economists and investors agree that there are cycles in the economy that need to be respected, the duration of such cycles is generally unknown. An investment decision to buy at the bottom of a business cycle may actually turn out to be a trade that occurs before or after the bottom of the cycle. If done before the bottom, then downside price action can result prior to any gains. If done after the bottom, then some upside price action may be missed. Similarly, a sell decision meant to occur at the top of a cycle may result in missed opportunity or unrealized losses.

Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations and are typically reflected in the client's Retirement Income Summary. The client may change these objectives at any time. Each client, after going through an Asset Allocation process, executes an Allocation Matrix that documents their objectives, risk tolerance, and their desired investment strategy.

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 Investments:

- *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.

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

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.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

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

Futures or Commodity Registration

Neither STRIDE Investments 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.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Some of our investment adviser representatives and personnel are separately licensed as independent insurance agents for various insurance companies and agencies when providing insurance services. You can therefore work with them in their separate capacities as insurance agents. When acting in their separate capacity as an insurance agent, our personnel can sell, for commissions, general insurance products. Our personnel primarily focus on life insurance, long-term care insurance, Medicare Supplements, disability insurance, and annuities, but only when appropriate for and in the best interest of the individual client.

When appropriate for you and in your best interest, our advisory personnel, in their separate capacity as an insurance agent, will suggest that you implement recommendations by purchasing life insurance, disability insurance, annuities or other insurance products. This receipt of commissions creates an incentive for our personnel to recommend those products for which they will receive a commission in their separate capacity as an insurance agent. This is a conflict of interest and, consequently, the advice rendered to you could be biased.

STRIDE Investments has taken steps to manage this conflict of interest by (i) only recommending insurance products to STRIDE Investments clients when in the best interest of the client and without regard to the financial interest of our advisory personnel in their separate capacities as insurance agents, (ii) not recommending insurance which results in

our advisory personnel receiving unreasonable compensation related to the recommendation, and (iii) disclosing in writing to a client any material conflicts of interest related to insurance recommendations.

No client is under any obligation to purchase any insurance product. Insurance products recommended by STRIDE Investments supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended by STRIDE Investments or its supervised persons through other, un-affiliated insurance agencies.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

STRIDE Investments will 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 Investments to the client. STRIDE Investments has the discretion to hire and fire sub-advisors of their choosing.

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

This practice represents a conflict of interest as STRIDE Investments 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 Investments.

One of the Sub-Advisors utilized by STRIDE Investments is Sound Income Strategies, LLC. Two owners of STRIDE Investments, Samuel McElroy and Patricia McElroy, hold a small minority ownership interest in Sound Income Group LLC, which is the parent company to Sound Income Strategies, LLC. Moreover, STRIDE Financial, LLC and STRIDE Investments, LLC operate collectively as a franchise of The Retirement Income Source which is a national branding initiative started in 2019 founded as a nationwide network of income specialists where individuals can find a financial advisor in their area who is a fiduciary and specializes in retirement income. While STRIDE Financial, LLC and STRIDE Investments, LLC operate independently from other franchisees that are part of the Retirement Income Source, all franchisees have agreed to a set of operational processes and procedures to maintain standards across all firms.

Sound Income Strategies, LLC and STRIDE Investments are not considered affiliated companies because Samuel McElroy and Patricia McElroy’s ownership interest in Sound

Income Strategies, LLC is below the 25% threshold for affiliation and they are not control persons of Sound Income Strategies, LLC.

However, because of their small minority ownership interest in Sound Income Group LLC, they have a clear conflict of interest and economic incentive to recommend Sound Income Strategies, LLC over other third-party investment adviser firms and money managers.

To control for this conflict of interest, we actively monitor the investment performance of Sound Income Strategies, LLC and compare this against industry peers. We do not have an exclusive agreement with Sound Income Strategies, LLC and have relationships and trading platforms in which Sound Income Strategies, LLC is not involved. We also maintain the right to remove Sound Income Strategies, LLC as a sub-advisor and discontinue participation in the Retirement Income Source if deemed necessary.

STRIDE Investments recommendation to use Sound Income Strategies, LLC will always be verbally disclosed and explained to clients. We make sure clients are made aware of Samuel McElroy and Patricia McElroy's ownership interest in Sound Income Strategies, LLC. Clients are not required to accept our recommendation to use Sound Income Strategies, LLC and can elect to use a different money manager.

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

Code of Ethics Description

The employees of STRIDE Investments have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of STRIDE Investments employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of STRIDE Investments. The Code reflects STRIDE Investments 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 Investments' 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 Investments 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 Investments' Code is based on the guiding principle that the interests of the client are our top priority. STRIDE Investments' 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 firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

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

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

STRIDE Investments and its employees can 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 Investments with copies of their brokerage statements.

The Chief Compliance Officer of STRIDE Investments 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.

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

STRIDE Investments does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended. 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 Investments with copies of their brokerage statements.

The Chief Compliance Officer of STRIDE Investments 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.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

STRIDE Investments requires that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. The final decision to custody assets with Schwab is at the discretion of the Advisor's clients, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. STRIDE Investments is independently owned and operated and not affiliated with Schwab. Schwab provides STRIDE Investments with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include 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 STRIDE Investments client accounts maintained in its custody, Schwab 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 Schwab or that settle into Schwab accounts.

Schwab also makes available to STRIDE Investments other products and services that benefit STRIDE Investments but may not benefit its clients' accounts. These benefits may include national, regional or STRIDE Investments specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of STRIDE Investments by Schwab 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 STRIDE Investments 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), provide research, pricing information and other market data, facilitate payment of STRIDE Investments fees from its clients' accounts, 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 STRIDE Investments accounts, including accounts not maintained at Schwab Advisor Services. Schwab Advisor Services also makes available to STRIDE Investments other services intended to help STRIDE Investments 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, human capital consultants, insurance, and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to STRIDE Investments by independent third parties. Schwab 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 STRIDE Investments. While, as a fiduciary, STRIDE Investments endeavors to act in its clients' best interests, STRIDE Investments' recommendation/requirement that clients maintain their assets in accounts at Schwab may be based in part on the benefit to STRIDE Investments of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Aggregating Securities Transactions for Client Accounts

We can elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when STRIDE Investments believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

STRIDE Investments uses the pro rata allocation method for transaction allocation.

Under this procedure, pro rata trade allocation means an allocation of the trade at issue among applicable advisory clients in amounts that are proportional to the participating advisory client's intended investable assets. STRIDE Investments will calculate the pro rata share of each transaction included in a block order and assigns the appropriate number of shares of each allocated transaction executed for the client's account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which STRIDE Investments or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

Item 13: Review of Accounts

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

Account reviews are performed quarterly by your assigned investment adviser representative. Account reviews are performed more frequently when market conditions dictate.

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.

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 Investments's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

In addition, STRIDE Investments can provide written performance and position reports to clients when requested and during client meetings.

You are encouraged to always compare any reports or statements provided by us against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

Item 14: Client Referrals and Other Compensation

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

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in Item 5 of this Disclosure Brochure. STRIDE Investments receives no other forms of compensation in connection with providing investment advice.

However, STRIDE Financial can charge fees of non-investment related financial planning and consulting services as described in Item 4 of this brochure. Such fees are separate and in addition to the fees charged by STRIDE Investments.

Moreover, our investment adviser representatives, in their separate capacities as insurance agents under STRIDE Financial, will also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits can affect their judgment when recommending insurance products to clients. While our investment adviser representatives endeavor at all times to put the interest of his clients first as a part of our overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest and may affect our investment adviser representatives' decision making process when making insurance recommendations in their capacity as insurance agents.

Clients may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Please see *Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.*

Advisory Firm Payments for Client Referrals

STRIDE Investments does not compensate for client referrals.

Item 15: Custody

Account Statements

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

STRIDE Investments is deemed to have custody of client funds and securities whenever STRIDE Investments is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody STRIDE Investments will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which STRIDE Investments is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from STRIDE Investments. When clients have questions about their account statements, they should contact STRIDE Investments or the qualified custodian preparing the statement.

Item 16: Investment Discretion

Discretionary Authority for Trading

When providing asset management services, STRIDE Investments maintains trading authorization over your Account and can provide management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if we are not able to reach you or you are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

Provisions for discretionary or non-discretionary trading authorization will be set forth, in writing, within our investment advisory client agreement.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to STRIDE Investments so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Discretionary Authority to Select Unaffiliated Sub-Advisers

As detailed in Item 4 of this brochure, if agreed upon with you, we will have discretionary authority to select for your Accounts one or more specific third-party investment adviser firms (individually “Sub-Advisor” and collectively “Sub-Advisors”) to manage the Account or a portion of the assets of the Account. When a Sub-Advisor is selected by our firm, the Sub-Advisor will have discretionary authority on your Account to place trades and make changes to the Account or the portion of your Account the Sub-Advisor is authorized to manage.

We will conduct due diligence of any recommended Sub-Advisor and monitor the performance of the Sub-Advisor with respect to the Sub-Advisor’s management of the designated assets of Account relative to appropriate peers and/or benchmarks.

We will be available to answer questions you have regarding any portion of your Account managed by a Sub-Advisor and will act as the communication conduit between you and the Sub-Advisor. A complete description of the Sub-Advisor’s services,

practices and fees will be disclosed in the Sub-Advisor's Form ADV Part 2A that will be provided to client.

Item 17: Voting Client Securities

Proxy Votes

STRIDE Investments does not vote proxies on securities. We have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in your accounts.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided. Although we do not vote client proxies, if you have a question about a particular proxy you can contact us. However, you will have the ultimate responsibility for making all proxy-voting decisions.

With respect to assets managed by a Sub-Advisor, we will not vote the proxies associated with these assets. You will need to refer to each Sub-Advisor's disclosure brochure to determine whether the Sub-Advisor will vote proxies on your behalf. You may request a complete copy of the Sub-Advisor's proxy voting policies and procedures as well as information on how your proxies were voted by contacting the Sub-Advisor or by contacting STRIDE Investments at the address or phone number indicated on Page 1 of this disclosure document.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because STRIDE Investments does not serve as a custodian for client funds or securities and STRIDE Investments does not require prepayment of fees of more than \$1,200 per client, six months or more in advance.

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

STRIDE Investments 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 Investments nor its owner has any bankruptcies to report.

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

SAMUEL A. MCELROY



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MARCH 2024

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.

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer

Samuel A. McElroy

- Year of birth: 1983
-

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
-

Item 3 Disciplinary Information

None to report.

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.

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.

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.