

# axiom

Integrated Advisor Solutions



## WRAP FEE PROGRAM DISCLOSURE BROCHURE

This wrap fee program brochure provides information about the qualifications and business practices of Portfolio Design Advisors, Inc., an SEC registered investment advisor.\* If you have any questions about the contents of this brochure, please contact us at 877-335-7035, option 1. 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 Portfolio Design Advisors, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our Firm SEC Number is 801-64971.

\*Registration with the SEC does not imply a certain level of skill or training.

# MATERIAL CHANGES

This item discusses specific material changes that are made to the disclosure brochure and provide readers with a summary of such changes.

Pursuant to SEC rules, Portfolio Design Advisors, Inc. (“PDA”) will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the firm’s fiscal year end, December 31. This means that if there were any material changes over the past year clients will receive a summary of those changes no later than April 30. At that time, PDA will also offer a copy of its most current disclosure brochure and will also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for PDA at any time by contacting us by telephone at 877-335-7035, option 1; or by email at [jen@axiomria.com](mailto:jen@axiomria.com).

The last annual update of this brochure was dated March 31, 2022. There have been material changes to the contents of this disclosure brochure since that time.

Removed language related to sub-advising an exchange traded fund, the Uncommon Portfolio Design Core Equity Fund as the fund was closed.

Removed disclosure indicating affiliation with GenTech, LLC. This technology company was sold so it is no longer under common ownership with PDA.

Updated language regarding client referrals. Solicitors are now referred to as Promoters and the rule number changed from 204(6)-3 to 204(6)-1.

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## SERVICES, FEES AND COMPENSATION

Portfolio Design Advisors, Inc. (“PDA” or “We”, an Investment Advisor registered with the Securities and Exchange Commission) offers services under a wrap fee program called Axiom. PDA has \$58,400,000 in Regulatory Assets Under Management (“RAUM”) as of December 31, 2021; these are managed on a discretionary basis. PDA has \$703,100,000 in Assets Under Advisement (“AUA”) as of December 31st, 2021. AUA includes assets held within PDA models available under our sister company’s, Geneos Wealth Management, Inc, (“Geneos”) custodial agreements in their Axiom program. PDA does not have discretion over Geneos’ assets. Both Axiom programs with PDA and Geneos are directed by the same team.

Within the Axiom program we provide investment supervisory services defined as giving continuous investment advice to you, the Client, (or making investments for you) based on the investment model selected. The Axiom program is a Unified Managed Account (“UMA”) program. This means that you are able to select multiple portfolio strategist models and each model is managed separately yet unified within a single account. We provide overlay portfolio management services to your entire account portfolio. This allows us to combine and customize multiple investment products to meet your goals. In this regard, we are responsible for rebalancing the portfolio when an asset class is out of tolerance by more than 2%, unless circumstances dictate otherwise, or if a portfolio strategist’s model moves into defensive positions, for example: a move to cash in certain market conditions. We also take instructions from your representative in order to complete specific trades, such as those for tax-loss harvesting purposes at year end, to raise cash for withdrawal requests, etc. We offer portfolio management services in which there are various models available with a qualified custodian for clients and advisors to choose from. Your representative will work with you to design an allocation among the models available and PDA will manage the account to the model allocations. The models are designed to utilize asset allocation strategies and do not attempt to engage in market timing or short-term trading. We provide ongoing evaluation and selection of portfolio strategists, investments and adjustment and balancing of portfolios. Various asset types are available, and they include: no-load mutual funds, load waived mutual funds, exchange traded funds, stocks, cash, and cash equivalents. Other asset types, like Unit Investment Trusts (“UIT”s), can be held within the account as a convenience to the customer as an excluded asset.

There are two options available for representatives to work with us, dependent upon their agreement with PDA. In both types of relationships, PDA provides continuous supervisory services and has trading discretion. One option available for representatives is as a promotor. Under this type of agreement, the representative will maintain the client relationship. They are responsible for reviewing the account with you and helping you determine which model allocation is appropriate based on your risk tolerance and investment objectives. The representative does not have discretion over the account’s model allocation. All model allocation changes are client directed. The promotor is registered as an IAR with another Registered Investment Advisor other than PDA. The other option available for representatives to work with PDA is as an Investment Advisor Representative. Under this type of agreement, the representative will maintain the client relationship. They are responsible for reviewing the account with you and helping you determine which model allocation is appropriate based on yours risk tolerance and investment objectives. The representative does not have discretion over the account’s model allocation. As an IAR, PDA is the Registered Investment Advisor for the IAR.

In both options when executing an agreement for services with us, PDA will be granted limited trading authority to execute transactions within the model allocations chosen by you and directed by the portfolio strategists. This discretionary trading authority includes the authority, without first consulting you to (1) determine the portion of assets in your account to allocate to each investment or asset class; (2) change your allocation of assets as necessary; and (3) take any and all other actions on your behalf that we determine are customary or appropriate for a discretionary investment advisor to perform, including the authority to buy, sell, select, remove, and replace securities, including mutual fund shares, stocks, bonds, and other investments for the account. You can place reasonable limitations and restrictions in relation to the trading authority. Any restrictions must be submitted to us in writing. PDA nor your representative has access to your funds and/or securities with the exception of having advisory fees deducted from your account and paid to us. Any fee deduction is done pursuant to your prior written authorization. For ERISA accounts, PDA will act as a limited ERISA 3(21) Fiduciary.

PDA charges for its investment supervisory services based on a percentage of assets under management. Typically, there is an annual fee that is negotiated between you and your representative up to 2.50%. Of the total fee charged to the client, PDA retains a portion referred to as the model cost and pays the difference to PDA Investment Advisor Representatives or firms who act as promoters on our behalf for the representative's benefit, as appropriate. Some portfolio strategists receive a portion of the model cost ranging from 0.00%-0.75% depending on the model selected. Each model's specific cost is disclosed to you within the Model Cost Disclosure. These costs are subject to change and you are able request updated cost information from your representative at any time. We compensate Axiom portfolio strategists from the advisory fee rates that are based on a percentage of the value of the total assets of the platform that are invested in accordance with the respective portfolio strategist's model portfolios. These fee rates are based on, among other things, asset class, investment style, and assets allocated to that particular portfolio strategist. Your account will be billed the Rep Fee Plus Model Cost; where your account is charged a set fee percentage (the rep fee) plus the model cost where the model cost will vary based on the account allocation but will never be more than 0.75% or 75 basis points. Each account is charged based on a tiered fee schedule. This means that the first \$500,000 of the account is charged the fee listed for that tier, the next \$500,000 is charged the fee listed for that tier and so on. The fee is calculated based on the calendar quarter ending account balance and is charged in arrears.

If you wish to contract with us and your representative for participation in the Axiom program, you are required to use only those broker-dealers and custodians approved by us. The qualified custodian will debit the fees on a quarterly basis from the account. The fees will be calculated by PDA based on the quarter ending balance. The fees will be charged in arrears and are prorated based on the number of days that services are provided during the calendar quarter.

Fees, fee structure, and experience vary by representative. Clients with different representatives will receive similar services and pay more or less of a fee than another client. Furthermore, representatives determine advisory fees differently. For example, some representatives aggregate all of your managed accounts together to determine a fee breakpoint or charge a fee based on each account size. There are advantages and disadvantages to all fee structures, but each representative has their own variances within PDA's fee structure. The fee that is negotiated between you and your representative is disclosed to you in the agreement that you sign in advance of services being provided. Representatives have an

incentive in the fee charged to the account as they receive the fee charged in excess of the model cost and listed in the Investment Management Agreement.

The Axiom program fee includes trading costs. It will cost you more or less than if you paid the ticket charges at the time of trade execution. The amount of trades placed in the account is a factor that has a bearing upon the relative cost of the program. If there are only a few trades placed in the account over a period of time, it is possible that paying for advisory services and ticket charges separately will be less expensive than the fee. The opposite is also true; if there are a large amount of trades placed in the account over a period of time, it is possible that paying for advisory services and ticket charges separately will be more expensive.

It is possible that you will incur other charges imposed by third parties besides us in connection with investments made through the account, including but not limited to mutual fund 12(b)-1 distribution fees, sub accounting fees, contingent deferred sales charges, short term redemption fees, qualified retirement plan fees, and account maintenance fees. A description of these fees and expenses are available in each investment company security's prospectus. PDA and its employees will not receive any portion of these fees.

You should be aware that mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to PDA. Fund companies also charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Income tax liabilities can result from the sale of individual securities within your account, unless the account is otherwise tax sheltered or tax deferred. Income tax liabilities directly reduce investment returns. You are responsible for all tax liabilities arising from the sale of individual securities within your account. Please consult your tax advisor as we cannot offer tax advice.

You, PDA, or your representative is able to terminate the agreement at any time by providing written notice to the appropriate party. If services are terminated within five business days of executing the agreement, services are terminated without penalty and no fees are due. If the account is to be liquidated as a result of a termination notice, we have up to five business days from the date of receipt to process the liquidation request. If termination is due to death, the portion of the account allocated to any tactical manager will be liquidated. Proceeds will be payable to the client subject to the usual securities settlement procedures. The final fee is prorated based on the number of days that services are provided prior to the effective date of termination. You are responsible for paying fees only for services rendered until the effective date of termination. Your account will be debited for the additional services.

## **ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS**

### **MINIMUM ACCOUNT SIZE**

Typically, we require a minimum account size of \$25,000 to establish and maintain a managed account. Each model also has minimum investment requirements. Most are \$25,000 or \$50,000; but some have lower minimums. Exceptions can be granted to this account minimum at our discretion, usually based

on your specific situation. For example, if the market value of the account drops below the minimum PDA is able to continue managing the account; or PDA can allow an account to be established below the minimum knowing that the account will receive additional funds soon.

#### **TYPES OF CLIENTS**

PDA provides investment advice to many different types of clients. These clients generally include individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other types of business entities.

## **PORTFOLIO STRATEGIST SELECTION AND EVALUATION**

PDA is the portfolio manager for all Axiom accounts. PDA is the only party with access to place trades recommended by portfolio strategists. Each portfolio strategist must meet certain criteria for having models within the Axiom program. Each strategist must have at least \$100 million in assets under management and they must have a minimum of a 3 year track record as an asset manager. The specific model does not need a 3 year track record, but the portfolio strategist must. PDA also reviews the type of model, strategic versus tactical for example, the model holdings, portfolio turnover, and if it fills a gap in our current model selections.

Recommendations of portfolio strategists to clients is primarily handled by each client's representative and is made in accordance with your investment objectives, risk tolerance and other relevant information. Representatives are able to request PDA's assistance in developing a portfolio of models for your account. Again, recommendations are made based on information provided by you related to their investment objectives, risk tolerance and other relevant information. You are responsible for notifying the representative of interim changes to personal and financial circumstances, needs, or goals. Such changes may include, but are not limited to: consideration or unexpected occurrence of a life changing event (e.g., marriage, divorce, children, promotion, unemployment, health issues, death); and achievement of or changes in goals (e.g., satisfied mortgage, large purchases, inheritance).

Performance is calculated by Morningstar using industry standards. Morningstar uses a geometrically linked return method also known as Time Weighted Return. Our reviews of model performance are based upon the calculated performance generated by Morningstar for each model. No performance from the portfolio strategist is used; only hypothetical returns are used as we do not have any composites.

There are portfolios available within the Axiom program that are created by PDA and named to reflect that. These models are created by PDA employees and their models will continuously be available for clients and their representative to select if they choose. While these models are not necessarily subject to the same selection and review process as other portfolio strategists, we strive to hold ourselves to the same performance standards and our portfolio management team makes adjustments to the portfolios as necessary to continue to achieve the models' stated goals.

#### **DESCRIPTION OF ADVISORY SERVICES OFFERED**

PDA offers asset management services under a wrap fee program marketed as the Axiom program; the focus of this brochure. The Axiom program offers several portfolio strategist models for representatives

and clients to choose from. PDA and your representative will continuously supervise the accounts and make trades when necessary, or at your request.

The models are designed to utilize asset allocation strategies and do not attempt to engage in market timing or short-term trading. We provide ongoing evaluation and selection of investments, and adjustment and balancing of portfolios.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates conflicts with your interest, so we operate under a special rule (DOL's Prohibited Transaction Exemption 2020-02) that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

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

#### **SERVICES TAILORED TO CLIENTS NEEDS**

Our services under the Axiom program offer several pre-determined portfolio models. You and your representative will select your portfolio models based on risk tolerance and investment objectives. You are given the ability to impose written restrictions on your accounts, including specific investment selections and sectors within reasonable parameters set by us and the portfolio strategist. We will not substitute another security for the restricted one or request that the portfolio strategist designate a substitute security. In some instances, certain restrictions placed on the account, will not allow for the selection of certain models. Any restrictions placed on the account have the possibility of adversely affecting the management of your account or the ability to meet your investment objectives. For this reason, it is important you understand that we perform advisory services including investment reporting for various clients, and that we can give advice or take actions for other clients that differ from the advice given to you.

#### **WRAP FEE PROGRAM VERSUS PORTFOLIO MANAGEMENT PROGRAM**

In traditional management programs, advisory services are provided for a fee but transaction services are billed separately on a per transaction basis. In wrap fee programs, advisory services and transaction services are provided for one fee. Under our Axiom wrap fee program, there are models provided by various portfolio strategists. Each account can allocate funds to one or more models. As the sponsor and advisor for the Axiom program, we receive a portion of the wrap fee charged to the account. The amount that we receive is listed in the Services, Fees and Compensation section of this brochure; and the specific model costs are listed on the Model Selection Worksheet.



### **PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Performance-based fees are defined as fees based on a share of capital gains or on capital appreciation of the assets held in a client's account. PDA does not charge or accept performance-based fees.

Side-by-side management refers to the process of evaluating accounts 'side-by-side' for fair and transparent allocations. We allocate all assets in accordance with regulatory mandates and are not basing these decisions between specific accounts for our own interests. We endeavor to place all trades for the same security on a given day through our average price account to ensure that all accounts receive the same price.

### **METHODS OF ANALYSIS AND INVESTMENT STRATEGIES**

PDA uses primarily fundamental analysis, but also uses charting, technical and cyclical analysis when considering investment strategies and recommendations. In simple terms, fundamental analysis involves analyzing company characteristics, charting looks at historical patterns, cyclical analysis looks at recurring periods, and technical analysis studies past market data looking for price trends and movements.

When implementing investment decisions, PDA employs several investment strategies: Long and Short Term Purchases, Strategic and Tactical Asset Allocation, Strategic Timing and Sector Rotation. Asset allocation is the combination of several different types of investments; typically stocks, bonds and cash equivalents among various asset classes so your investments are diversified. The objective of asset allocation is to develop an investment plan that will help investors reach their financial goals, while holding down their risks. Strategic timing is designed to reduce risks in bear markets (when markets are decreasing in value). This is a trend-following strategy that involves holding total cash positions during bear markets and fully invested positions during bull markets. Sector rotation is employed only in the growth portfolio models, spreading the risk over several sectors in the more aggressive models. In bull markets, the technique can consist of using the stronger industrial sectors or surrogates for various market indexes ("bull" funds). In bear markets, it can consist of employing "bear" funds that are structured to rise in price when the market indexes decline in price. Also, when our portfolio manager believes market conditions call for the use of leverage, we can employ leveraged bull or bear funds that are more volatile than the market indexes.

Investing in securities involves a risk of loss that you should be prepared to bear, including loss of your original principal. However, you should be aware that past performance of any security is not necessarily indicative of future results. Therefore, you should not assume that future performance of any specific investment or investment strategy will be profitable. We do not provide any representation or guarantee that your goals will be achieved.

Investing in securities involves risk of loss. Further, depending on the different types of investments, there will be varying degrees of risk.

### **VOTING CLIENT SECURITIES**

We do not perform proxy voting services on your behalf. You are instructed to read through the information provided with the proxy voting documents and to make a determination based on the information provided. Upon your request, we are able, but not required, to provide limited clarifications of the issues presented in the proxy voting materials based on our understanding of issues

presented in the proxy voting materials. However, you have the ultimate responsibility for making all proxy voting decisions.

## **CLIENT INFORMATION PROVIDED TO PORTFOLIO STRATEGISTS**

PDA does not provide client specific information to outside portfolio strategists. PDA only provides limited information so that the strategists can confirm the assets under management within their portfolio and the fee that PDA pays them for providing us their model information.

## **CLIENT CONTACT WITH PORTFOLIO STRATEGISTS**

There is no client contact with the outside portfolio strategists. The strategists provide asset and trade information to PDA related to their models that we have selected to make available in our program. All of the trading and account access is limited to PDA, our employees, our representatives and our clients. Portfolio Strategists do not have direct client account access. Clients are always welcome to contact PDA or their representative for any assistance or questions they have related to their account.

## **ADDITIONAL INFORMATION**

### **DISCIPLINARY INFORMATION**

Neither the firm nor its employees have been involved in any event that requires disclosure.

### **OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

PDA is registered as an SEC Registered Investment Advisor only and does not engage in any other activities that are not described in this brochure.

PDA is a wholly owned subsidiary of GWM Holdings, Inc. GWM Holdings, Inc. also owns Geneos Wealth Management, Inc. ("Geneos"), which is a FINRA registered broker-dealer and SEC Registered Investment Advisor. Management personnel of PDA are also involved in various management roles in their capacity as employees, registered representatives and investment advisor representatives of Geneos.

### **CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

According to the Investment Advisors Act of 1940, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. PDA has a fiduciary duty to all clients. PDA has established a Code of Ethics which all people defined as access persons must read and then execute an acknowledgement stating that they understand and agree to comply with PDA's Code of Ethics. PDA's fiduciary duty to clients is considered the core underlying principle for PDA's Code of Ethics and represents the expected basis for all dealings with clients. PDA has the responsibility to make sure that the interests of clients are placed ahead of it or its representatives' own investment interest. All representatives will conduct business in an honest, ethical and fair manner. All representatives will comply with all federal and state

securities laws at all times. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to services being conducted. All representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the representatives' duty of complete loyalty to their clients. This section is only intended to provide you with a description of PDA's Code of Ethics. If you wish to review PDA's Code of Ethics in its entirety, a copy can be requested at any time by contacting us by telephone at 877-335-7035, option 1.

It is possible for PDA or its representatives to buy or sell securities or have an interest or position in a security for their personal account, which they also recommend to clients. PDA is and shall continue to be in compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. As these situations can represent a potential conflict of interest, it is a policy of PDA that no representative shall prefer his or her own account to that of the advisory client. PDA maintains information about all securities holdings for it and its employees, which is reviewed on a regular basis.

#### **REVIEW OF ACCOUNTS**

Account reviews and model reviews are performed on an ongoing basis. The portfolio strategist reviews their models regularly and adjusts them as necessary. Each representative is responsible for reviewing their own client accounts and monitoring the portfolio to determine when changes are needed. Other factors that might trigger a review include: market conditions, news releases from one of the investment companies in which the client is invested, the need to rebalance the client's account, or a request from the client.

You receive statements from your account custodian monthly if there is activity in the account and quarterly if there is no activity in the account.

#### **CLIENT REFERRALS AND OTHER COMPENSATION**

We compensate unaffiliated persons, called "promoters" either directly or indirectly when they refer to us clients they believe would benefit from our investment advisory services. In all cases these referral fee arrangements will be disclosed to the clients in accordance with section 206(4)-1 of the *Investment Advisors Act*. Compensation to the Promotor is dependent on the client entering into an advisory agreement with PDA for advisory services. Compensation to the Promotor will be the amount of the fee charged to the client that is above PDA's standard fee schedule, also known as the model cost. PDA's referral program is in compliance with federal regulations as set out in 17 CFR Sections 275.206(4)-1. The referral fee is paid pursuant to a written agreement retained by PDA and the Promotor. You will be provided with a copy of this brochure and the client disclosure document detailing the amount we will pay the Promotor prior to or at the time of entering into any investment advisory contract with PDA. Your advisory fee will not be increased as a result of compensation being shared with a Promotor.

PDA also licenses its models to other Registered Investment Advisors under model licensing agreements. The other RIA firm pays PDA a percentage of assets they manage utilizing PDA models. PDA is strictly a fee only investment management firm. PDA does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. No commissions in any form are accepted. No finder's fees are accepted.

## FINANCIAL INFORMATION

This item is not applicable to our brochure. We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for its most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, we have not been the subject of a bankruptcy petition at any time.

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Integrated Advisor Solutions



Wes Strode  
9055 E Mineral Circle  
Centennial, CO 80112  
877-335-7035

## INVESTMENT ADVISOR REPRESENTATIVE BROCHURE SUPPLEMENT

This brochure supplement provides information about Wes Strode that supplements the Portfolio Design Advisor, Inc.'s Disclosure Brochure. You should have received a copy of that brochure. Please contact us at 877-335-7035, option 1 if you did not receive PDA's Disclosure Brochure or if you have any questions about the contents of this supplement.

Additional information is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

Wes Strode, CFA

Born in 1976, Wes graduated from the University of Nebraska at Lincoln with a Bachelor of Science in 1999. He went on to receive his Master of Accounting and Financial Management from the Keller Graduate School of Management in 2011. From 1999 – 2005 Wes worked as an Account Manager with State Street Bank and Trust in Kansas City, MO. He then moved to Denver, CO and worked at Old Mutual Capital as a Senior Investment Analyst from 2005 – 2011. From 2011 – 2012 he was the Senior Portfolio Manager with Advised Assets Group, LLC. Since February 2012 he has been the Portfolio Manager for PDA and a Portfolio Manager for Geneos Wealth Management, Inc.

### **CFA®**

Chartered Financial Analyst (CFA®) is a charter that is globally recognized graduate level curriculum that provides proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning. It also emphasizes the highest ethical and professional standards. To earn the CFA charter the candidate must have four years of qualified investment work experience; and must become a member of CFA Institute (the global association of investment professionals that administers the CFA charter), pledging to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis; the candidate must apply for membership to a local CFA member society; and must complete three exams, spending an average of 300 hours of study per exam.

## **DISCIPLINARY INFORMATION**

Wes Strode has no disciplinary information to disclose.

## **OTHER BUSINESS ACTIVITIES**

Wes Strode is also a registered representative of Geneos Wealth Management, Inc. in its capacity as a broker-dealer and an investment advisor representative in its capacity as a Registered Investment Advisor. He is employed with Geneos Wealth Management as a Portfolio Manager. Geneos Wealth Management, Inc. and PDA are commonly owned by GWM Holdings, Inc.

## **ADDITIONAL COMPENSATION**

Wes Strode's primary income is a salary from Geneos Wealth Management, Inc. for his employment as a Portfolio Manager for both Geneos and for Portfolio Design Advisors, Inc.

## **SUPERVISION**

Jen Pattavina is the Chief Compliance Officer of PDA. She is responsible for developing and overseeing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by PDA and its investment advisor representatives. She may be contacted at 877-335-7035, option 5. Dean Rager is the President for PDA. He assists with the daily monitoring and supervision of the investment advisor representatives and the management program. He may be contacted at 877-335-7035.

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Paul Knipping  
9055 E Mineral Circle  
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# INVESTMENT ADVISOR REPRESENTATIVE BROCHURE SUPPLEMENT

This brochure supplement provides information about Paul Knipping that supplements the Portfolio Design Advisor, Inc.'s Disclosure Brochure. You should have received a copy of that brochure. Please contact us at 877-335-7035, option 1 if you did not receive PDA's Disclosure Brochure or if you have any questions about the contents of this supplement.

Additional information is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

Paul Knipping, CFA

Born in 1985, Paul studied finance at the University of Colorado at Denver, School of Business. His background includes experience at several top financial firms with a focus on trading and investment analysis, beginning in 2006 with Charles Schwab as a Client Service Associate. Later that year he moved to Merrill Lynch as an Investment Associate. From 2008-2009 he was a Junior Equity Trader in the SMA group at Oppenheimer Funds. From 2009-2012 Paul worked as a Variable Annuity Analyst, contributing to AUV calculation methodology, before moving to the Fiduciary Services Team creating 15(c) reports for mutual fund companies at Lipper. From 2012-2013 Paul worked as an Investment Banking Analyst at SDR Ventures, a Denver based investment bank where he focused on buy-side and sell-side transactions, as well as debt and equity capital raises. Since August of 2013 he has been a Portfolio Analyst for PDA and a Portfolio Analyst for Geneos Wealth Management, Inc.

### **CFA®**

Chartered Financial Analyst (CFA®) is a charter that is globally recognized graduate level curriculum that provides proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning. It also emphasizes the highest ethical and professional standards. To earn the CFA charter the candidate must have four years of qualified investment work experience; and must become a member of CFA Institute (the global association of investment professionals that administers the CFA charter), pledging to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis; the candidate must apply for membership to a local CFA member society; and must complete three exams, spending an average of 300 hours of study per exam.

## **DISCIPLINARY INFORMATION**

Paul Knipping has no disciplinary information to disclose.

## **OTHER BUSINESS ACTIVITIES**

Paul Knipping is employed with Geneos Wealth Management as a Portfolio Analyst. Geneos Wealth Management, Inc. and PDA are commonly owned by GWM Holdings, Inc.

## **ADDITIONAL COMPENSATION**

Paul Knipping's primary income is a salary from Geneos Wealth Management, Inc. for his employment as a Portfolio Analyst for both Geneos and for Portfolio Design Advisors, Inc.

## **SUPERVISION**

Jen Pattavina is the Chief Compliance Officer of PDA. She is responsible for developing and overseeing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by PDA and its investment advisor representatives. She may be contacted at 877-335-7035, option 5. Dean Rager is the President for PDA. He assists with the daily monitoring and supervision of the investment advisor representatives and the management program. He may be contacted at 877-335-7035.



# axiom

Integrated Advisor Solutions



Dean Rager  
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# INVESTMENT ADVISOR REPRESENTATIVE BROCHURE SUPPLEMENT

This brochure supplement provides information about Dean Rager that supplements the Portfolio Design Advisor, Inc.'s Disclosure Brochure. You should have received a copy of that brochure. Please contact us at 877-335-7035, option 1 if you did not receive PDA's Disclosure Brochure or if you have any questions about the contents of this supplement.

Additional information is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

Dean Rager

Born in 1958, Dean holds the Series 7, 24 and 66 licenses. He completed a Bachelor of Science degree in Business Administration and Human Resource Management and received a Master of Science in Computer Information Systems from the University of Phoenix. Prior to joining Geneos, he served as Chief Information Officer for ING Advisors Network where he oversaw its technological infrastructure. As a past president of a 500 rep broker dealer, he was responsible for the day-to-day and financial operations of the firm. Dean has been with Geneos Wealth Management, Inc. since 2004 as the Senior Vice President. Along with the daily responsibility for Geneos' technology solutions, Dean also has oversight for the firm's OSJs and home office registered personnel. As the Chief Compliance Officer of the Geneos Registered Investment Advisor he is responsible for the oversight of the Geneos advisory programs. Dean has been involved with PDA since 2009, officially taking over responsibilities as President in 2014.

## **DISCIPLINARY INFORMATION**

Dean Rager has no disciplinary information to disclose.

## **OTHER BUSINESS ACTIVITIES**

Dean Rager is also a registered representative of Geneos Wealth Management, Inc. in its capacity as a broker-dealer and an investment advisor representative in its capacity as a Registered Investment Advisor. He is also an independently licensed insurance agent. He is employed with Geneos Wealth Management as a Senior Vice President and RIA Chief Compliance Officer.

## **ADDITIONAL COMPENSATION**

Dean Rager's primary income is a salary from Geneos Wealth Management, Inc. for his employment as Senior Vice President and Advisory Chief Compliance Officer for Geneos, and President for Portfolio Design Advisors, Inc.

## **SUPERVISION**

Jen Pattavina is the Chief Compliance Officer of PDA. She is responsible for developing and overseeing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by PDA and its investment advisor representatives. She may be contacted at 877-335-7035, option 5. Dean Rager is the President for PDA. He assists with the daily monitoring and supervision of the investment advisor representatives and the management program. He may be contacted at 877-335-7035.