

**FORM ADV PART 2A
DISCLOSURE BROCHURE**



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This brochure provides information about the qualifications and business practices of Strategic Advisors, Inc. Being registered as a registered 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 510-278-0915. 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 Strategic Advisors, Inc. (CRD #142220) is available on the SEC's website at www.adviserinfo.sec.gov

**~~SEPTEMBER 21,~~
~~2017~~DRAFT**

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.

Material Changes since the Last Update

Since last filing of this brochure on ~~August~~ September 21, 2017, the following items have been updated:

- Items 4 and 5 have been updated to add ~~payment options for ERISA~~ new services and to disclose the fees for the new services; and
 - Item 4 has been updated to disclose the current assets under management calculation.
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Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 510-278-0915 or by email at: saincinfo@gmail.com

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Item 4: Advisory Business

Firm Description

Strategic Advisors, Inc (“we” or “the Firm” or “Advisor”) was formed as a corporation under the laws of the State of California in September 2006. It subsequently became a California registered investment adviser on April 13, 2007. The Firm’s sole shareholder is Daven S. Sharma. Additional information about Mr. Sharma is available in Section 19, below.

Advisor is a fee based advisory firm. Advisor does not act as a custodian of client assets. The client always maintains asset control.

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

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Under CCR Section 260.238(k), Advisor, its representatives or any of its employees will disclose to the clients all material conflicts of interest.

Types of Advisory Services

ASSET MANAGEMENT SERVICES

The Firm provides discretionary portfolio management services where the investment advice provided is tailored to meet the individualized needs and investment objectives of the client. The Firm uses an asset allocation model based upon the individual Clients life stage and risk tolerance. With discretionary portfolio management, the Firm is authorized to perform various functions, at the Client’s expense, without further approval from the Client. Such functions include the determination of securities to be purchased or sold and the amount of securities to be purchased or sold.

ERISA 3(38) Investment Manager. Advisor provides ERISA 3(38) Investment Management services in which it has discretionary management and control of a given retirement plan’s assets. Advisor would then become solely responsible and liable for the selection, monitoring and replacement of the plan’s investment options.

1. Fiduciary Services are:

- Advisor has discretionary authority and will make the final decision regarding the initial selection, retention, removal and addition of investment options in accordance with the Plan’s investment policies and objectives.
- Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder.
- Assist the Client in the development of an investment policy statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan.

- Provide discretionary investment advice to the Client 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).
- 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.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

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 Adviser'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 Adviser is not providing fiduciary advice as defined by ERISA to the Plan participants. Adviser 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.

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

3. The Adviser has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- a. Employer securities;
- b. Real estate (except for real estate funds or publicly traded REITs);
- c. Stock brokerage accounts or mutual fund windows;
- d. Participant loans;
- e. Non-publicly traded partnership interests;
- f. Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- g. Other hard-to-value or illiquid securities or property.

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

FINANCIAL PLANNING SERVICES

Financial planning consultations are offered on tax planning, insurance planning, retirement planning and estate planning. Through a series of personal interviews, the Firm will collect pertinent data on a Client's financial situation including identifying goals, risk tolerance, objectives, financial problems, potential solutions, prepare specific recommendations and implement recommendations. After the personal interviews, the Firm will make appropriate recommendations for the discussed strategies along with methods of implementing the advice.

SOLICITOR ARRANGEMENTS

Advisor solicits the services of third party money managers to manage client accounts. In such circumstances, Advisor receives solicitor fees from the third party money manager. Advisor acts as the liaison between the client and the third party money manager in return for an ongoing portion of the advisory fees charged by the third party money manager. Advisor helps the client complete the necessary paperwork of the third party money manager, provides ongoing services to the client, will provide the third party money manager with any changes in client status as provided to Advisor by the client and review the quarterly statements provided by the third party money manager. Advisor will deliver the Form ADV Part 2, Privacy Notice and Solicitor's Disclosure Statement of the third party money manager. Clients placed with third party money managers will be billed in accordance with the third party money manager's fee schedule which will be disclosed to the client prior to signing an agreement. This is detailed in Item 5 of this brochure.

NON-TRADED INVESTMENTS

Advisor may provide investment advice and due diligence about certain non-traded investments like REITs and BDCs for those clients who represent they meet certain investor standards. Advisor will:

- Monitor investment on a regular basis
- Report on investment as part of regular reviews
- Review investment is performing to appropriate benchmarks
- Assist client when changes or offers are made by existing product sponsors
- Perform due diligence on the sponsoring company on an ongoing basis
- Include updates into financial planning software
- Exit options when appropriate
- Reinvestment advice

Due diligence will continue throughout the duration of the investment. Advisor will offer to meet with the client at least on an annual basis for the duration of the investment.

The fees for these services will be based on a percentage of the investment value detailed in Item 5 of this brochure.

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 objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

Wrap Fee Programs

Advisor does not sponsor any wrap fee programs.

Client Assets under Management

As of ~~July 31~~November 12, 2017, Advisor managed a total of ~~\$8,899,113~~13,819,800 assets under management on a discretionary basis and ~~\$5,967,499~~5,878,641 on a non-discretionary basis.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

Advisor bases its fees on a percentage of assets under management.

ASSET MANAGEMENT

Advisor offers discretionary asset management services to advisory clients. The fees for these services will be based on a percentage of Assets Under Management as follows:

Assets Under Management	Annual Fee
Up to \$49,999	2.00%
\$50,000 to \$99,999	1.75%
\$100,000 to \$249,999	1.5%
\$250,000 to \$499,999	1.25%
\$500,000 and up	1.00%

Fees will be calculated, accrued and due monthly or quarterly in advance, depending on the platform used.

The pro-rated first monthly or quarter's management fee will be calculated on the Account's initial market value as reported by the Client's custodian. Thereafter, the management fee will be calculated on the Account's preceding month or quarter-end value as reported by the account's custodian. Cash balances and investments in money market funds, demand deposit accounts, and certificates of deposit at banks or brokerage firms are covered by the Account and are included in the fee calculations.

The annual Fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Advisory fees deducted from the clients' account by the custodian will be reflected in a provided fee invoice as fees are withdrawn. The fees must be paid within ten (10) days following the beginning of the period which the account is being billed for. 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 ten (10) days written notice. Client will be entitled to a pro rata fee for the days service was not provided in the final billing cycle. 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.

ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets and will not exceed 1%. Fees may be charged quarterly or monthly in arrears or advance based on the assets

as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets) on the last business day of the previous billing cycle. If the services to be provided start any time other than the first day of a cycle, the fee will be prorated based on the number of days remaining in the cycle. If this Agreement is terminated prior to the end of the fee period, Advisor shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be entitled to a pro-rate refund based on the number of days service was not provided during the final billing period.

The fee schedule, which includes compensation of Advisor for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. Advisor does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, Advisor will disclose this compensation, the services rendered, and the payer of compensation. Advisor will offset the compensation against the fees agreed upon under this Agreement.

FINANCIAL PLANNING FEES

The aforementioned Financial Planning Services are provided on an hourly or fixed fee basis in accordance with the following fee schedule:

Hourly Fee

The Firm assesses an hourly rate not to exceed \$350 an hour for consulting related financial planning services. The hourly fee can be negotiated with the Client and it will be agreed upon in advance and in writing. The number of hours will vary depending upon the complexity of the financial situation, the estimate of hours involved, including preparation and research, areas to be specified and estimated in the written agreement for services. One-half of the anticipated total hourly fee is generally due and payable at the time the Client's agreement is executed, and the remainder of the fee is due upon presentation of a plan or the rendering of consulting services. The Firm may waive or reduce a portion of its Hourly fee for portfolio management Clients. For prepaid fees in excess of \$500.00, services will be completed within six months of the date fees are received.

Fixed Fee

The Firm's fixed financial planning fee ranges between \$1,000 and \$3,000. The fixed fee can be negotiated with the Client and it will be agreed upon in advance and in writing. The fee is due at the time the Client signs the financial planning agreement. One-half of the anticipated total fixed fees are generally due and payable at the time the Client's agreement is executed, and the remainder of the fee is due upon presentation of a plan or the rendering of consulting services. The Firm may waive or reduce a portion of its fixed fee for portfolio management Clients. For prepaid fees in excess of \$500.00, services will be completed within six months of the date fees are received.

Termination of Financial Planning Services

A Client may terminate this service for any reason within the first five (5) business days after signing the contract without any cost or penalty. Thereafter, the contract may be

terminated at any time by giving five (5) days written notice to the Advisor. Upon written notice of termination, any pre-paid fees will be prorated for the number of hours that services were rendered based on the termination date. (The hourly fee rate will be equal to the fee rate stated in the Client agreement and the fixed fee rate will be equal to \$350 an hour.) Any surplus will be returned to the client within five (5) business days of cancellation.

PLEASE NOTE: When Firm provides financial planning services and the Client implements the financial plan through the Firm, the Firm's representatives may receive compensation in the form of a commission or fee. This creates a conflict of interest between the Firm and the Client. Therefore, when providing financial planning services, the Firm would like Clients to note: (a) a conflict exists between the Firm's interests and the interests of the Client, (b) The Client is under no obligation to act upon the Firm's recommendation, and (c) if the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through the Firm.

SOLICITOR ARRANGEMENTS

Advisor has entered into a Solicitor Agreement with Gradient Investments, LLC ("GI"), Equis Capital and Loring Ward.

Gradient Investments LLC (Gradient)

Advisor has legacy clients whose assets are managed by Gradient. No new clients of Advisor will be managed by Gradient.

EQIS CAPITAL MANAGEMENT, INC. ("Equis")

Advisor has legacy clients whose assets are managed by Equis. No new clients of Advisor will be managed by Equis.

LWI Financial Inc. ("Loring Ward")

Advisor has legacy clients whose assets are managed by Loring Ward. No new clients of Advisor will be managed by Loring Ward.

NON-TRADED INVESTMENTS

Advisor will charge clients an annual rate based on the assets under management according to the following schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
<u>Up to \$49,999</u>	<u>2.00%</u>
<u>\$50,000 to \$99,999</u>	<u>1.75%</u>
<u>\$100,000 to \$249,999</u>	<u>1.5%</u>
<u>\$250,000 to \$499,999</u>	<u>1.25%</u>
<u>\$500,000 and up</u>	<u>1.00%</u>

This annual fee is for the above referenced work on certain alternative investments including, but not limited to non-traded Real Estate Investment Trusts (REITs), Master Limited Partnerships (MLPs), Delaware Statutory Trusts (DSTs) and Business Development Companies. In some cases the fee may be negotiable in size and duration depending on the complexity of the investment and the client's preference. Fees are billed

quarterly in arrears based on an average daily balance of the assets held in the account during the previous quarter, excluding any cash. Advisor will invoice the client directly to pay the fee or the client may direct Advisor to pay the fee out of the custodial account or a separate non-qualified account held with Advisor.

Client Payment of Fees

Fees will not be based upon a share of capital gains or capital appreciation of the funds or of any portion of the funds under advisory contract. Fees for services to be performed will not be collected six or more months in advance. The Firm will request written permission from the Client to withdraw the Fees directly from the Client's account. The withdrawal process is described in Item 15, Custody, below.

Additional Client Fees Charged

The Firm's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that shall be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, asset based fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Firm's fee and it shall not receive any portion of these commissions, fees, and costs. Item 12 further describes the factors that the Firm considers in selecting or recommending broker-dealers for Client transactions and determining the reasonableness of their compensation (e.g., commissions). For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Advisor charges asset management fees monthly or quarterly in advance.

External Compensation for the Sale of Securities to Clients

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

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.

Advisor does not use a performance-based fee structure because of the conflict of interest.

Item 7: Types of Clients

Description

The Firm provides advice to individuals including high net worth individuals, pension plans and corporations or other businesses. The advice to individuals and high net worth individuals may be for a variety of account types including but not limited to individual,

trust, joint, family charitable foundations, individual retirement accounts, or other qualified accounts.

Account Minimums

The Firm requires a minimum account size of \$250,000 to open or maintain an account. At its discretion, however, the Firm may open or maintain an account below the required minimum. The firm may change its minimum account size limits at any time and notify the clients that do not meet the new minimum requirements to either (i) bring additional deposits to meet the new minimums, or (ii) terminate the engagement and request the clients to transfer their account to other firm(s).

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

Methods of Analysis

With respect to the Firm's method of analysis and investment strategy it recommends two strategies, an asset allocation strategy and a tactical asset allocation strategy. At the beginning of the Adviser-Client relationship, the Firm explains each strategy to its clients and allows them to choose which they believe will be fit their goals and objectives.

Investment Strategy

The first strategy managed by the Firm or the Third Party Adviser, is an asset allocation model. When chosen by a Client the Firm will recommend an asset allocation based on the life stage and risk tolerance of the individual client. The investment strategy is passive with most positions generally held for over a year. These portfolios are reviewed every ninety (90) days and rebalanced, if necessary, to bring the various asset classes closer to the original allocation.

The second strategy, managed by the Firm or the Third Party Adviser, is a tactical asset allocation strategy. This investment strategy is subject to portfolio adjustments based upon market conditions and future expectations of the market. As such, this strategy contains an inherent risk that the adviser may incorrectly guess the future direction of the market and may buy or sell securities at the wrong time, resulting in losses or missed opportunities for the Client.

Security Specific Material Risks

The Firm uses several types of securities in its clients' accounts. These securities may include, but are not limited to, the following: Mutual Funds such as Large Cap Growth, Large Cap Value, Mid Cap Growth, Mid Cap Value, Small Cap Growth, and Small Cap Value; Exchanged Trade Funds; ADRs; Stocks; Bonds; Domestic Real Estate; Foreign Real Estate; Commodities; Options; Precious Metals; Preferred Stock; High Yield Debt; Emerging Markets; Foreign Fixed Income; Domestic Fixed Income; Money Market Funds and Cash.

All investments bear different types and degrees of risk and **investing in securities involves risk of loss that clients should be prepared to bear.** While we recommend various securities that are designed to provide appropriate investment diversification, some investments have significantly greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. Clients

need to ask questions about risks they do not understand. We would be pleased to discuss them.

We strive to render our best judgment on behalf of our clients. Still, we cannot assure or guarantee Clients that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment adviser but is not a reliable predictor of future performance. We continuously strive to provide outstanding long-term investment performance, but many economic and market variables beyond our control can affect the performance of an investment portfolio.

An investment could lose money over short or even long periods. A Client should expect his/her account value and returns to fluctuate within a wide range, like the fluctuations of the overall stock and bond markets. The client's account performance could be hurt by:

- **Stock market risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.
- **Interest rate risk:** The chance that bond prices overall will decline because of rising interest rates. Interest rate risk will vary for the Client, depending on the amount of Client assets invested in bonds.
- **Manager risk:** The chance that the proportions allocated to the various securities will cause the Client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- **Active management fees risk:** Active management strategies that involve frequent trading generate higher transaction costs that diminish the fund's return. In addition, the short-term capital gains resulting from frequent trades often have an unfavorable income tax impact when such funds are held in a taxable account.
- **International Investing Risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, and regulatory and financial reporting standards, that differ from those of the U.S.
- **Terrorism Risk:** The chance that stock domestic and international stock prices will decline due to a terrorist event.
- **Political Risk:** The chance that a change in government may affect stock prices of domestic or international stocks.
- **Natural Risks:** The chance that a natural catastrophe (earthquakes, hurricanes, etc.) may affect stock prices of domestic or international stocks.
- **REIT Risk:** To the extent that a Client invests in REITs, it is subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of

real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.

- **Private Equity/Placement Risk:** Because offerings are exempt from registration requirements, no regulator has reviewed the offerings to make sure the risks associated with the investment and all material facts about the entity raising money are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security. Risk of the underlying investment may be significantly higher than publicly traded investments.

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

The firm and its management have not been involved in administrative enforcement proceedings required to be reported.

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 required to be reported.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Advisor is not registered as a broker-dealer and no affiliates are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither Advisor nor its employees are registered or has 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

Mr. Sharma is the sole owner of and independent insurance agent (Life and Health Licensed) with Abundance Insurance Solutions, Inc. This business is considered investment related and he may recommend it to Clients. With the ability to work as a Client's insurance agent and investment adviser representative, this could be viewed as a conflict of interest because each service pays a separate fee or commission. However, Mr. Sharma mitigates any conflicts of interest to the best of his ability by placing the Clients' interests ahead of his own and through the implementation of policies and procedures that address the conflict.

Mr. Sharma is also part time independent contractor with a professional accounting firm, Davis and Co. This business is not investment related. He spends approximately 15% of his work month on this activity with some during trading hours. Mr. Sharma may recommend these services to Clients. With the ability to work as a Client's certified public accountant and investment adviser representative, this could be viewed as a conflict of interest because each service pays a separate fee or commission. However, Mr. Sharma mitigates any conflicts of interest to the best of his ability by placing the Clients' interests ahead of his own and through the implementation of policies and procedures that address the conflict.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

The Firm offers the service of selection and monitoring of third party advisers as a core service to its clients. Please see Items 4 and 5 for additional details.

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

Code of Ethics Description

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

One area 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.

Advisor's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Advisor 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.

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

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

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

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Advisor 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

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

The Chief Compliance Officer of Advisor is Daven Sharma. He reviews all employee trades each quarter. The personal trading reviews help mitigate that the personal trading of employees does not affect the markets and that clients of the firm have received preferential treatment over employee trades.

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

Advisor does maintain a firm proprietary trading account, but does not have a material financial interest in any securities being recommended. In addition, 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, Advisor's account will be traded at the same time as the clients for similar portfolios and employees are required to disclose all reportable securities transactions as well as provide Advisor with copies of their brokerage statements.

The Chief Compliance Officer of Advisor is Daven Sharma. 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

When the Firm recommends brokers or custodians, it seeks broker-dealers who offer competitive commissions costs together with reliable services. A Client's choice of another broker-dealer is acceptable if proven feasible. The Firm has and continues to recommend TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC/NFA, for transaction execution related to portfolio management services. The Firm recognizes its fiduciary responsibility in negotiating brokerage commissions, assuring best execution practices and assuring adequate investment availability/inventory on behalf of its Clients. The Firm does not receive cash compensation with respect to execution of trades at any brokerage firm.

With the use of independent broker-dealers, a Client may incur a ticket charge, sales commission or asset based fee for the sale or purchase of securities.

When using the services of a Third Party Adviser, the Firm relies on the Third Party Adviser's recommendation of a broker or custodian. Pursuant to the contract between the Firm and the Third Party Adviser, it is the Third Party Adviser's responsibility to negotiate brokerage commission, assure best execution practices and assure adequate investment availability/inventory on behalf of Clients.

The Firm has an ongoing duty to seek the lowest possible total cost for the client's transactions. When the Firm selects or recommends broker-dealers for a client's transactions it considers a broker's:

- Commissions
- breadth and quality of services
- execution capability
- financial responsibility
- responsiveness
- quality of services provided
- experience
- reputation
- comfort level of the client

If you choose not to select a broker yourself, we discuss our relationships with discounted brokers with you. We can negotiate the most favorable commission and service levels for you and document agreed upon service levels and commission charges.

RESEARCH AND SOFT DOLLAR BENEFITS

We receive research or other products or services other than execution from broker-dealers in connection with client securities transactions. Please see the next section for additional details

BROKERAGE FOR CLIENT REFERRALS

We participate in several referral service programs. There is no direct link between our participation in these programs and the investment advice we give to you. We do receive economic benefits for the service provided without cost or at a discount including

- receipt of duplicate statements and confirmations

- access to a trading desk
- assistance with conferences, and educational meetings
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate appropriate shares to client accounts)
- the ability to have advisory fees deducted directly from client accounts
- access to an electronic communication network for client order entry and account information
- access to mutual funds with no transaction fees & certain institutional money managers
- certain institutional money managers research related products and tools
- consulting & professional services
- discounts on compliance, marketing, technology, and practice management products or services provided by third party vendor. These products and services may assist us in managing and administering your accounts including accounts not maintained at the referred brokerage firm
- benefit us but may not benefit your accounts

These services are intended to help us manage and further develop our business enterprise. They do not depend on the amount of brokerage transactions that are directed to the referral programs.

As part of our fiduciary duty to you, we endeavor at all times to put your interest first.

TD AMERITRADE

We participate in the TD AMERITRADE Institutional program. TD AMERITRADE

Institutional:

- is a division of TD AMERITRADE, Inc. (“TD AMERITRADE”) member FINRA/SIPC/NFA.
- is an independent and unaffiliated SEC-registered broker-dealer and FINRA member.
- offers us services which include custody of securities, trade execution, clearance and settlement of transactions.

We receive some benefits from TD AMERITRADE through participation in the program.

(Please see the disclosure below and under Item 14).

We consider a number of factors in selecting and/or recommending brokers and custodians for our clients’ accounts, including, but not limited to:

- execution capability;
- experience and financial stability;
- reputation; and
- the quality of services provide.

NON-TRADED INVESTMENTS

Non-traded investments may be custodied at other firms.

Aggregating Securities Transactions for Client Accounts

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

Item 13: Review of Accounts

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

Daven Sharma, President, reviews Portfolio Management Accounts on a quarterly basis. He also reviews Financial Plans on an annual basis with his Clients. Finally, he reviews third-Party Adviser's accounts when he receives copies of their quarterly statements.

Review of Client Accounts on Non-Periodic Basis

Additional reviews are conducted periodically depending on market conditions, economic or political events, or by changes in a client's financial situation (such as retirement, termination of employment, physical move or inheritance).

Content of Client Provided Reports and Frequency

The Firm does not prepare regular client reports. Portfolio Management and Third Party Adviser Clients receive at least quarterly statement from their custodian. The Firm urges Clients to carefully review such statements.

Item 14: Client Referrals and Other Compensation

Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest

Our firm participates in several referral programs.

TD Ameritrade – As disclosed in Item 12 above, the Firm participates in TD Ameritrade's institutional customer program and the Firm may recommend TD Ameritrade to its clients for custody and brokerage services. There is no direct link between the Firm's participation in the program and the investment advice given to clients, although the Firm receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors.

These benefits include the following products and services (provided without cost or at a discount).

- receipt of duplicate client statements and confirmation
- research related products and tools
- consulting services
- access to a trading desk serving our participants
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts)

- the ability to have advisory fees deducted directly from client accounts
- access to an electronic communications network for client order entry and account information
- access to mutual funds with no transaction fees and to certain institutional money managers
- discounts on compliance marketing research, technology, and practice management products or services provided to us by third party vendors
- TD Ameritrade may also have paid for business consulting and professional services received by our related persons
- Some of the products and services made available by TD Ameritrade through the program may assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise.

The benefits received by the Firm or its personnel through its participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade.

As part of the Firm's fiduciary duties to its clients, the Firm endeavor at all times to put the interest of its clients first. Clients should be aware, however that the receipt of economic benefits by the Firm or its related persons in and of itself creates a potential conflict of interest and may indirectly influence its choice of TD Ameritrade for custody and brokerage services.

Advisory Firm Payments for Client Referrals

Advisor does not compensate for client referrals.

Item 15: Custody**Account Statements**

All Client funds, securities and accounts are held at third-party custodians. The Firm does not take possession of a Client's funds or securities. However, with respect to Portfolio Management Services (Firm managed accounts) the Client will be asked to authorize the Firm with the ability to deduct fees directly from the Client's account. This authorization will be to deduct the Firm's management fee only. Prior to deducting the fee, the Firm shall send a billing statement (invoice) to the Client that indicates the fee to be withdrawn, how it was calculated and the amount on which it was calculated. A Client may object to the deduction of the Firm's fees from the Account by notifying the Firm at the address or telephone number shown on each billing statement or by notifying Client's custodian. The Client's custodian will also send a quarterly statement indicating the amount of fees withdrawn from the Client's Account. The Firm urges each Client to carefully review such statements.

Item 16: Investment Discretion

Discretionary Authority for Trading

Advisor accepts discretionary authority to manage securities accounts on behalf of clients. Advisor has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize Advisor discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

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

Item 17: Voting Client Securities

Proxy Votes

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

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

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because Advisor does not serve as a custodian for client funds or securities and Advisor does not require prepayment of fees of more than \$500 per client and six months or more in advance.

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

Advisor 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

No bankruptcy petitions to report.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Advisor does not receive any performance based fees.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

No management persons of Advisor have any disclosures to report.

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Material Conflicts of Interest Assurance

All material conflicts of interest regarding the Advisor, its representatives or any of its employees which could be reasonably expected to impair the rendering of unbiased and objective advice are disclosed as required under CCR Section 260.238(k).

ITEM 1 COVER LETTER

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Daven S. Sharma



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Suite 202
San Leandro, CA 94578

Tel: 510-278-0915
Fax: 510-278-9433

saincinfo@gmail.com

This brochure supplement provides information about Daven Sharma and supplements the Strategic Advisors, Inc. brochure. You should have received a copy of that brochure. Please contact Daven Sharma if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Daven Sharma (CRD #1865424) is available on the SEC's website at www.adviserinfo.sec.gov.

**SEPTEMBER 21,
2017 DRAFT**

Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure

Principal Executive Officer

Daven Sharma

- Year of birth: 1959
-

Item 2 Educational Background and Business Experience

Educational Background:

- The University of Delhi, India; Bachelors of Arts in Accounting

Certified Public Accountant

Certified Financial Planner™(CFP®)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s has determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Experience:

- Strategic Advisors, Inc.; President/CEO/Investment Advisor Representative; 04/2007 to Present
- Abundance Insurance Solutions, Inc.; President/Insurance Agent; 06/2014 to Present
- Academy of Financial Planning, a not for profit organization; Founder; 05/2016 to Present
- Davis & Co.; CPA 03/2017 to Present
- Davis & Co.; President/CEO/CPA; 07/2002 to 03/2017
- Daven Sharma Insurance Services; Insurance Agent; 08/1997 to 05/2014
- Genworth Financial Securities Corp; Registered Representative; 09/2002 to 02/2007

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities

Mr. Sharma is an independent insurance agent (Life and Health Licensed). He spends approximately 40% of his work month on this activity, which is considered investment related. Mr. Sharma may recommend these services to Clients. With the ability to work as a Client's insurance agent and investment adviser representative, this could be viewed as a conflict of interest because each service pays a separate fee or commission. However, Mr. Sharma mitigates any conflicts of interest to the best of his ability by placing the Clients' interests ahead of his own and through the implementation of policies and procedures that address the conflict.

Mr. Sharma is also a part owner of a professional accounting firm, Davis and Co. This business is not investment related. He spends approximately 15% of his work month on this activity with some during trading hours. Mr. Sharma may recommend these services to Clients. With the ability to work as a Client's certified public accountant and investment adviser representative, this could be viewed as a conflict of interest because each service pays a separate fee or commission. However, Mr. Sharma mitigates any conflicts of interest to the best of his ability by placing the Clients' interests ahead of his own and through the implementation of policies and procedures that address the conflict.

Mr. Sharma spends approximately 5% of his time in his "not-for-profit" business. This does not create a conflict of interest.

Item 5 Performance Based Fee Description

Mr. Sharma does not receive performance based fees.

Item 6 Supervision

Since Mr. Sharma is the sole owner of Strategic Advisors, Inc. 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.

Item 7 Requirements for State-Registered Advisors

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.