

**Schedule H of  
Form ADV  
Page 1**

Applicant:

SEC File Number:

Date:

801-

(for sponsors of wrap fee programs)

Name of wrap fee program or programs described in attached brochure:

- 1. *Applicability of Schedule.*** This Schedule must be completed by applicants that are compensated under a wrap fee program for sponsoring, organizing, or administering the program, or for selecting, or providing advice to clients regarding the selection of, other investment advisers in the program (“sponsors”). A wrap fee program is any program under which a specified fee or fees not based directly upon transactions in a client’s account is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and execution of client transactions.
- 2. *Use of Schedule.*** This Schedule sets forth the information the sponsor must include in the wrap fee brochure it is required to deliver or offer to deliver to clients and prospective clients of its wrap fee programs under Rule 204-3 under the federal Advisers Act and similar rules of jurisdictions. The wrap fee brochure prepared in response to this Schedule must be filed with the Commission and the jurisdictions as part of Form ADV by completing the identifying information on this Schedule and attaching the brochure. Brochures should be prepared separately, not on copies of this Schedule. Any wrap fee brochure filed with the Commission as part of an amendment to Form ADV shall contain in the upper right corner of the cover page the sponsors’ registration number (801- ).
- 3. *General Contents of Brochure.*** Unlike Parts I and II of this form, this Schedule is not organized in “check-the-box” format. These instructions, including the requests for information in Item 7 below, should not be repeated in the brochure. Rather, this Schedule describes minimum disclosures that must be made in the brochure to satisfy the sponsor’s duty to disclose all material facts about the sponsor and its wrap fee programs. **Nothing in this Schedule relieves the sponsor from any obligation under any provision of the federal Advisers Act or rules thereunder, or other federal or state law to disclose information to its advisory clients or prospective advisory clients not specifically required by this Schedule.**
- 4. *Multiple Sponsors.*** If two or more persons fall within the definition of “sponsor” in Item 1 above for a single wrap fee program, only one such sponsor need complete the Schedule. The sponsors may choose among themselves the sponsor that will complete the Schedule.
- 5. *Omission of Inapplicable Information.*** Any information not specifically required by this Schedule that is included in the brochure should be applicable to clients and prospective clients of the sponsor’s wrap fee programs. If the sponsor is required to complete this Schedule with respect to more than one wrap fee program, the sponsor may omit from the brochure furnished to clients and prospective clients of any wrap fee program or programs information required by this Schedule that is not applicable to clients or prospective clients of that wrap fee program or programs. If a sponsor of more than one wrap fee program prepares separate wrap fee brochures for clients of different programs, each brochure must be filed with the Commission and the jurisdictions attached to a separate copy of this Schedule. Each such brochure must state that the sponsor sponsors other wrap fee programs and state how brochures for those programs may be obtained.
- 6. *Updating.*** Sponsors are required to file an amendment to the brochure promptly after any information in the brochure becomes materially inaccurate. Amendments may be made by use of a “sticker”, *i.e.*, a supplement affixed to the brochure that indicates what information is being added or updated and states the new or revised information, as long as the resulting brochure is readable. Stickers should be dated and should be incorporated into the text of the brochure when the brochure itself is revised.
- 7. *Contents of Brochure.*** Include in the brochure prepared in response to this Schedule:

  - (a) on the cover page, the sponsor’s name, address, telephone number, and the following legend in bold type or some other prominent fashion:  
**This brochure provides clients with information about [name of sponsor] and the [name of program or programs] that should be considered before becoming a client of the [name of program or programs]. This information has not been approved or verified by any governmental authority.**
  - (b) a table of contents reflecting the subject headings in the sponsor’s brochure.
  - (c) the amount of the wrap fee charged for each program or, if fees vary according to a schedule established by the sponsor, a table setting forth the fee schedule, whether such fees are negotiable, the portion of the total fee (or the range of such amounts) paid to persons providing advice to clients regarding the purchase or sale of specific securities under the program (“portfolio managers”), and the services provided under each program (including the types of portfolio management services);

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- (d) a statement that the program may cost the client more or less than purchasing such services separately and a statement of the factors that bear upon the relative cost of the program (*e.g.*, the cost of the services if provided separately and the trading activity in the client's account);
- (e) if applicable, a statement that the person recommending the program to the client receives compensation as a result of the client's participation in the program, that the amount of this compensation may be more than what the person would receive if the client participated in other programs of the sponsor or paid separately for investment advice, brokerage, and other services, and that the person may therefore have a financial incentive to recommend the wrap fee program over other programs or services;
- (f) a description of the nature of any fees that the client may pay in addition to the wrap fee and the circumstances under which these fees may be paid (including, if applicable, mutual fund expenses and mark-ups, mark-downs, or spreads paid to market makers from whom securities were obtained by the wrap fee broker);
- (g) how the program's portfolio managers are selected and reviewed, the basis upon which portfolio managers are recommended or chosen for particular clients, and the circumstances under which the sponsor will replace or recommend the replacement of the portfolio manager;
- (h) (1) if applicable, a statement to the effect that portfolio manager performance information is not reviewed by the sponsor or a third party and/or that performance information is not calculated on a uniform and consistent basis,  
  
(2) if performance information is reviewed to determine its accuracy, the name of the party who reviews the information and a brief description of the nature of the review,  
  
(3) a reference to any standards (*i.e.*, industry standards or standards used solely by the sponsor) under which performance information may be calculated;
- (i) a description of the information about the client that is communicated by the sponsor to the client's portfolio manager, and how often or under what circumstances the sponsor provides updated information about the client to the portfolio manager;
- (j) any restrictions on the ability of clients to contact and consult with portfolio managers;
- (k) in narrative text, the information required by Items 7 and 8 of Part II of this form and, as applicable to clients of the wrap fee program, the information required by Items 2, 5, 6, 9A and C, 10, 11, 13 and 14 of Part II;
- (l) if any practice or relationship disclosed in response to Item 7, 8, 9A, 9C and 13 of Part II presents a conflict between the interests of the sponsor and those of its clients, explain the nature of any such conflict of interest; and
- (m) if the sponsor or its divisions or employees covered under the same investment adviser registration as the sponsor act as portfolio managers for a wrap fee program described in the brochure, a brief, general description of the investments and investment strategies utilized by those portfolio managers.

**8. Organization and Cross References.** Except for the cover page requirements in Item 7(a) above, information contained in the brochure need not follow the order of the items listed in Item 7. However, the brochure should not be organized in such a manner that important information called by the form is obscured.

Set forth below the page(s) of the brochure on which the various disclosures required by Item 7 are provided.

Page(s)			Page(s)			Page(s)		
Item	7(a)	cover	Item	7(f)		Item	7(j)	
	#7(b)			#7(g)			#7(k)	
	#7(c)			#7(h)			#7(l)	
	#7(d)			#7(i)			#7(m)	
	#7(e)							



## Asset Allocation Avenue Account

May 5, 2009

This Disclosure Document ("Brochure") provides clients with information about Strategic Investment Advisors, Inc. ("SIA") and the Asset Allocation Avenue Account ("AAA Account" or "the Account") wrap fee program that it sponsors. The disclosures herein should be read, understood, and considered by every investor before becoming a client of the AAA Account. This information has not been approved or verified by *any* governmental or regulatory authority. Inquiries concerning this product or this Brochure should be directed to SIA at (704) 983-5959.

Strategic Investment Advisors, Inc.  
Attn: Wrap Program Management  
123 North First Street  
Albemarle, NC 28001  
(704) 983-5959

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## INTRODUCTION

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SIA is an investment adviser registered with the U.S. Securities and Exchange Commission (“SEC”).

SIA provides individualized discretionary investment management services to various categories of institutional, as well as individual clients.

In this SIA sponsored account, SIA investment adviser representatives (“IAR”) offer clients a professionally managed portfolio based on the individual needs and tolerances of the client wherein the fees for advisory services and execution of securities transactions are “wrapped” into a single fee. All investors in the AAA Account are provided brokerage services through a brokerage account at Uvest Financial Services Group, Inc. (“Uvest”), a broker-dealer registered with the SEC and a member of the Financial Industry Regulatory Authority (“FINRA”).

## PORTFOLIO MANAGEMENT ACCOUNT PROGRAM

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### AAA Account

The AAA Account allows the IAR to provide discretionary portfolio management of clients’ funds. The client’s IAR may recommend a model portfolio allocation that will be suitable to the client’s individual investment objectives and risk appetite. This program is offered for one all-inclusive fee, which encompasses investment advisory services and brokerage transactions.

#### Investment Adviser Representatives

As part of the Account, the IAR helps the client by designing and managing the clients’ accounts, composed of mutual funds, exchange-traded funds (“ETFs”), cash, and other products. Investment decisions and recommendations are determined based upon the client’s investment objectives, risk tolerance, net worth, net income, age, time horizon, tax situation and other various suitability factors. The Account is not referred to third party investment managers; rather, the IAR manages the client’s custom account on an individualized basis.

SIA representatives design, revise, reallocate, and manage portfolios tailored to the clients’ individual investment objectives. The composition of such portfolios will typically be selected from mutual funds and exchange-traded funds (“ETFs”).

## Portfolios Based on Investment Objectives

<b>Conservative Avenue</b>	Large Cap Growth	0.00%	<b>Conservative:</b> The conservative range is designed for the cautious investor, one with a low risk tolerance and/or a short time horizon. It is targeted toward the investor seeking investment stability and liquidity from his/her investable assets.
	Large Cap Value	20.00%	
	Mid Cap Equities	0.00%	
	Small Cap Equities	3.00%	
	Intl Equities	2.00%	
	Emerging Markets	8.00%	
	REITs	6.00%	
	Long Term Bonds	4.00%	
	Intermediate Term Bonds	10.00%	
	Short Term Bonds	30.00%	
	High Yield Bonds	3.00%	
	Intl Bonds	12.00%	
	Cash	2.00%	
<b>Moderately Conservative Avenue</b>	Large Cap Growth	0.00%	<b>Moderately Conservative:</b> The moderately conservative risk range is appropriate for the investor who seeks both modest capital appreciation and income from his/her portfolio. This investor will have either a moderate time horizon or a slightly higher risk range.
	Large Cap Value	27.00%	
	Mid Cap Equities	0.00%	
	Small Cap Equities	4.00%	
	Intl Equities	2.00%	
	Emerging Markets	10.00%	
	REITs	8.00%	
	Long Term Bonds	5.0%	
	Intermediate Term Bonds	7.00%	
	Short Term Bonds	17.00%	
	High Yield Bonds	5.00%	
	Intl Bonds	13.00%	
	Cash	2.00%	
<b>Moderate Avenue</b>	Large Cap Growth	0.00%	<b>Moderate:</b> This range will best suit the investor who seeks relatively stable growth from his/her investable assets offset by a low level of income. An investor in the moderate risk range will have a higher tolerance for risk and/or a longer time horizon than either of the previous investors. The main objective of an individual within this range is steady portfolio growth.
	Large Cap Value	34.00%	
	Mid Cap Equities	0.00%	
	Small Cap Equities	6.00%	
	Intl Equities	4.00%	
	Emerging Markets	11.00%	
	REITs	11.00%	
	Long Term Bonds	5.00%	
	Intermediate Term Bonds	3.00%	
	Short Term Bonds	9.00%	
	High Yield Bonds	4.00%	
	Intl Bonds	11.00%	
	Cash	2.00%	
<b>Moderately Aggressive Avenue</b>	Large Cap Growth	2.00%	<b>Moderately Aggressive:</b> This range is designed for investor with a relatively high tolerance for risk and a longer time horizon. This investor has little need for current income and seeks above-
	Large Cap Value	40.00%	
	Mid Cap Equities	0.00%	
	Small Cap Equities	7.00%	
	Intl Equities	5.00%	

	Emerging Markets	13.00%	average growth. The main objective of this risk range is capital appreciation, and the investor should be able to tolerate moderate fluctuations in his/her portfolio values.
	REITs	14.00%	
	Long Term Bonds	3.00%	
	Intermediate Term Bonds	2.00%	
	Short Term Bonds	3.00%	
	High Yield Bonds	3.00%	
	Intl Bonds	6.00%	
	Cash	2.00%	
<b>Aggressive Avenue</b>	Large Cap Growth	2.00%	<b>Aggressive:</b> This range is appropriate the investor who has both a high tolerance for risk and a long investment time horizon. The main objective is to provide high growth although substantial fluctuations may occur.
	Large Cap Value	24.00%	
	Mid Cap Equities	0.00%	
	Small Cap Equities	19.00%	
	Intl Equities	10.00%	
	Emerging Markets	18.00%	
	REITs	21.00%	
	Long Term Bonds	0.00%	
	Intermediate Term Bonds	0.00%	
	Short Term Bonds	0.00%	
	High Yield Bonds	2.00%	
	Intl Bonds	2.00%	
	Cash	2.00%	

The specific investment allocations and proportions of the individual components of any portfolio may vary over time.

To determine the appropriate “Avenue,” selection is determined based upon the client’s responses to an investor profile questionnaire involving investment objectives, risk tolerance, net worth, net income, age, time horizon, tax situation and other various suitability factors. Depending upon specific entry and exit dates, times, prices, availability and other factors, performance of accounts within the same investment objective may differ and clients should not expect that performance of their account portfolio will be necessarily identical to other clients of SIA in the same or a similar portfolio.

The asset allocation models are intended, but not guaranteed, to take advantage of market uptrends and to take defensive action during market downtrends. SIA believes that sophisticated computer models, investment experience, and the advanced analytical and engineering skills of SIA’s personnel add value for clients but makes no claims or guarantees of future performance.

Client data, such as risk tolerance, financial status, occupation, and other suitability factors will be collected by SIA. After the IAR has analyzed this data, SIA provides the client with an Agreement (“Agreement”). Either the client or SIA may terminate the agreement upon five days written notice from the date the Agreement is signed. SIA will refund prepaid fees on a pro-rated basis when the Account is closed.

Restrictions and guidelines imposed by clients may affect the composition and performance of clients’ accounts (as a result, performance of accounts within the same investment objective may differ and clients should not expect that the performance of their accounts will be identical to any other client of SIA).

## AAA Account Fees

The client pays SIA a fee for its services based on a percentage of the value of the client's account. The fee structure for the Account is as follows:

### **AAA ACCOUNT**

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<b>MARKET VALUE OF ASSETS</b>	<b>(ANNUAL FEE)*</b>
Any	1.85

**\* Includes a 0.35% custodial fee**

**Fees are payable on a quarterly basis, in advance, and based on the portfolio value on the last business day of the preceding quarter.**

The Agreement provides that fees are not negotiable. Fees charged for investment management services are payable quarterly, in advance, utilizing the then-current fee structure, based upon the market value of assets in the client's account on the last business day of the preceding calendar quarter. The Agreement will continue in effect until terminated by either party upon five (5) days signed and written notice to the other party. In the event of termination, the quarterly advance fee will be prorated for the active period of the quarter and the unearned portion of the fee will be refunded. A full refund will be provided without penalty if the client terminates the Agreement, in writing, within five (5) days of the Agreement being executed. The Agreement may not be assigned without the prior written consent of all parties to the contract.

The fee includes execution charges and may not include certain dealer mark-ups and mark-downs, odd-lot differentials, transfer taxes, handling charges, exchange fees, offering concessions and related fees for purchases of closed-end investment companies, and any other charges imposed by law on transactions in a client's account. SIA also may choose to change the fees charged for the Account. Any changes to the fees will be preempted by a thirty (30) days advance written notice to clients. In addition, clients must establish an account with Uvest to take part in the Account. Fees charged by Uvest may be more or less than other investment management and broker-dealer firms charge for similar services.

The Account may cost the client more or less than purchasing such services separately. The variables that aggregate to the cost of the Account include the estimated cost of the services if provided separately outside of the Account, the level of trading activity in a client's account, the size of the account, the types of investment advisory services, and the types of investments.

## Performance Reporting

SIA purports to accurately report performance information to clients; however, performance figures are not reviewed or audited by any third parties. Performance is calculated net of fees and based on the market price of securities reported by the custodian as of the end of the statement cycle.



## INVESTMENT PORTFOLIO MANAGERS

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### Client Communication and Information

SIA, as the sponsor and manager of the Account, will serve as the client's sole point of contact concerning the client's investment in the Account. There are no restrictions on the client's ability to contact their portfolio manager.

Subsequent to the initial data gathering process performed by SIA and as part of its ongoing services, clients will be sent a notice annually requesting that clients inform SIA of any changes in their financial condition and investment objectives. SIA will ensure that the client's IAR is furnished with such notices.

Clients will receive quarterly or monthly statements from Uvest that are marked to the market showing all activity during the reporting period, including transactions, account holdings, deposits, withdrawals, dividends, and estimated yield as well as the deduction of any fees, expenses or other charges from the account.

### Reviews

SIA's Investment Committee creates certain model portfolios that may consist of carefully researched mutual funds, unit investment trusts, units of loan pool investments, exchange traded funds, stocks, bonds, and various banking products/services that are representative of varying risk tolerance levels ranging from aggressive to conservative. The Investment Committee monitors the investments in these portfolios on a quarterly basis. The investment adviser representative ("IAR") assigned to each account monitors his/her clients' accounts on a quarterly basis.

SIA Managed Accounts are reviewed quarterly by the IAR and portfolio allocation variance is reviewed semi-annually. If any client portfolio varies by 5% or more from the recommended allocation suggested by the Investment Committee, a re-allocation is generally recommended to the client so as to bring the portfolio back into line with the suggested model portfolio. Personal and suitability information is also reviewed at this time.

The Chief Compliance Officer will maintain a list of the investment adviser representatives assigned to each of SIA's accounts in order to verify the identity of the reviewer of the account at any given point in time. Reviewers are instructed to review for investment suitability and account performance. The following individuals, including IARs and Investment Committee members, are responsible for reviewing client accounts:

Roger Dick	Christy Stoner	Martha O'Brien
Natalie Almond	Jeffrey Talley	Misty Thornburg
David Gaskin	Sherman Greer	Michael Harwood
Brooke Laton	Lorelei Misenheimer	Teresa Lowder
Donna Pleasant	Rodney Pepper	

For accounts that are a part of the AAA Account program, the IAR assigned to each account monitors his/her clients' account(s) on a quarterly basis. Pershing's performance reports are reviewed quarterly and IARs meet with clients annually, at which time personal and suitability information will be reviewed. Further, the Account will be rebalanced if it reaches a 5% or greater variance from the model target allocation, as determined by quarterly drift reports run by the Firm.

Events that may trigger further client account reviews in addition to the standard quarterly review process may include, but would not be limited to, a notable increase in the volume of requests by the client to effect transactions in his/her account(s), where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Other factors may include requests by the client to liquidate certain securities positions/contracts where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Additional triggering factors could be the performance on an individual account being an outlier to the performance of accounts with similar investment objectives, and a very important trigger would be customer complaints. This last trigger would be a prime example of a trigger for an intermittent review of a client account.

Annually, for all accounts, the IARs will update the client's information. It is to be explained that the client should provide the IAR with notice once the client's investment objectives or financial situation changes.

## GENERAL INFORMATION ABOUT SIA

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SIA's business is as an investment adviser registered with the SEC. It provides services to pensions and profit sharing plans, trusts, estates, corporations, and individuals.

### SIA Personnel

SIA seeks to employ investment professionals with the highest personal integrity and the dedication, ability, training, and experience to provide superior investment management services to each of our clients. SIA generally requires that its personnel have a college degree or equivalent business experience, preferably in the field of investments. Advanced degrees are desirable but not required. SIA personnel must have and maintain all licenses required by applicable laws and rules to provide investment advice.

SIA is affiliated with The Strategic Alliance Corporation ("TSAC"), a registered broker/dealer, and BOS Agency, a licensed insurance agency, both of which are subsidiaries of Bank of Stanly ("BOS") which, in turn, is a subsidiary of Uwharrie Capital Corporation ("UCC"), a bank holding company. In addition, UCC owns Cabarrus Bank and Trust ("CBT"), and Anson Bank and Trust ("ABT"). Certain securities-related products and services offered by TSAC, insurance-related products offered through BOS Agency, and banking-related products and services offered through BOS, CBT and/or ABT may be available to clients of SIA. Certain persons associated with SIA may also be associated with one or more of the above named affiliated companies. Such persons' duties and functions relating to the affiliated companies may represent up to 50% or more of any such individual's overall professional activities.

<b>Investment Adviser Representative:</b>	<b>Roger Lee Dick</b>	
<b>Year of Birth:</b>	<b>1951</b>	
<b>Formal education after high school.</b>		
<b>Institution</b>	<b>Degree / Major</b>	<b>Years</b>
University of North Carolina, Charlotte	M.B.A.	1975
Appalachian State University	B.S., Business	1973
<b>Business background for the preceding five years.</b>		
<b>Entity</b>	<b>Title</b>	<b>Dates</b>
Strategic Investment Advisors, Inc.	Investment Committee	1996-Present
Uwharrie Capital Corp.	President & CEO	1983-Present

<b>Investment Adviser Representative:</b>	<b>Christy Davis Stoner</b>	
<b>Year of Birth:</b>	<b>1964</b>	
<b>Formal education after high school.</b>		
<b>Institution</b>	<b>Degree / Major</b>	<b>Years</b>
Converse College	B.A. History and Economics	1987
<b>Business background for the preceding five years.</b>		
<b>Entity</b>	<b>Title</b>	<b>Dates</b>
Strategic Investment Advisors, Inc.	President/CEO/IC/Director	1991-Present
Strategic Alliance Corporation	President & CEO	1993-Present

<b>Investment Adviser Representative:</b>	<b>Martha W. O'Brien</b>	
<b>Year of Birth:</b>	<b>1944</b>	
<b>Formal education after high school.</b>		
<b>Institution</b>	<b>Degree / Major</b>	<b>Years</b>
Southern Methodist University	B.A. History and Spanish	1965
<b>Business background for the preceding five years.</b>		
<b>Entity</b>	<b>Title</b>	<b>Dates</b>
Strategic Investment Advisors, Inc.	SVP, Operations/CCO	1995-Present
Strategic Alliance Corporation	SVP, Operations	1993-Present
Uvest Financial Services Group, Inc.	Program Manager	2005-Present

<b>Investment Adviser Representative:</b>	<b>Sherman Lee Greer</b>	
<b>Year of Birth:</b>	<b>1980</b>	
<b>Formal education after high school.</b>		
<b>Institution</b>	<b>Degree / Major</b>	<b>Years</b>
Wingate University	B.S., Mathematics	2000-2004
<b>Business background for the preceding five years.</b>		
<b>Entity</b>	<b>Title</b>	<b>Dates</b>
Strategic Investment Advisors, Inc.	Portfolio Manager/Investment Committee	2004-Present
Strategic Alliance Corporation	Financial Consultant	2004-Present
Talbert’s Unlimited	Sales Associate	2002-2003
GNC	Sales Associate	2002
Rusco Fixture Co.	Shipping/Receiving	2001

<b>Investment Adviser Representative:</b>	<b>Jeffrey Talley</b>	
<b>Year of Birth:</b>	<b>1974</b>	
<b>Formal education after high school.</b>		
<b>Institution</b>	<b>Degree / Major</b>	<b>Years</b>
University of North Carolina, Charlotte	M.B.A.	2003
University of North Carolina, Charlotte	B.S., Economics	1996
<b>Business background for the preceding five years.</b>		
<b>Entity</b>	<b>Title</b>	<b>Dates</b>
Strategic Investment Advisors, Inc.	Executive Vice President	2001-Present
Uwharrie Capital Corp.	SVP	1997-Present
Uvest Financial Services Group, Inc.	Program Manager	2005-Present

<b>Investment Adviser Representative:</b>	<b>Misty Thornburg</b>	
<b>Year of Birth:</b>	<b>1977</b>	
<b>Formal education after high school.</b>		
<b>Institution</b>	<b>Degree / Major</b>	<b>Years</b>
University of North Carolina, Charlotte	B.S., Finance	1999
<b>Business background for the preceding five years.</b>		
<b>Entity</b>	<b>Title</b>	<b>Dates</b>
Strategic Investment Advisors, Inc.	AVP/Investment Adviser Representative/IC	2000-Present

## Additional Compensation and Conflicts of Interest

SIA is a wholly owned subsidiary of UCC, a bank holding company, which in turn owns BOS, Cabarrus Bank and Trust, and Anson Bank and Trust. UCC and its affiliate banks may make banking clients aware of the services provided by SIA but none of the banking affiliates offers investment advice nor recommends specific securities to clients or prospective clients. SIA and/or its associated persons may receive compensation from such affiliates, in the event clients of SIA purchase bank-related products (such as certificates of deposit) offered by SIA's affiliates. SIA may facilitate the completion of any paperwork or other activities/steps necessary for the client to make such a purchase. In the event clients of SIA purchase certain products offered by SIA's affiliates, SIA and/or its associated persons may receive compensation from such affiliates.

From time to time, BOS, Cabarrus Bank and Trust, and Anson Bank and Trust may serve as custodian for certain assets subject to the investment advisory services of SIA.

SIA representatives or its personnel may invest for their own accounts or have a financial interest in the same securities or other investments that the Firm recommends or acquires for the accounts of its clients, and may engage in transactions that are the same as or different than transactions recommended to or made for client accounts. Such transactions are permitted if effected, pre-cleared and reported in compliance with SIA's Policy on Personal Securities Transactions. Generally, personal securities transactions will not be pre-cleared when an order for the same or a related security is pending for the account of a client. The Firm's Chief Compliance Officer reviews reports of personal transactions in securities by SIA representatives quarterly or more frequently if required.

As part of SIA's relationship with a custodian/clearing institution as well as other broker-dealers, it may be provided with research products and commission payments from clients' investments transacted through those other entities. Research products provided by other entities which assist SIA in its investment decision-making process for its clients, provided in relation to transactions directed to those other entities, shall be in compliance with Section 28(e) of the Securities Exchange Act of 1934 ("the Act"). Specifically, although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, SIA may receive from a particular broker-dealer/custodian, without cost, support services which allow SIA to better monitor and service client accounts maintained at a particular broker-dealer/custodian.

## Disciplinary Disclosure

SIA does not have any disciplinary actions to disclose.