

# DISCLOSURE BROCHURE

## StrataCore Capital Management, LLC

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This brochure provides information about the qualifications and business practices of StrataCore Capital Management, LLC. 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 646-846-6500. 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 StrataCore Capital Management, LLC (CRD#171163) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**NOVEMBER 9, 2015**

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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

Since the last filing of this brochure on September 03, 2015 the following amendments have been made to comply with regulations from the Pennsylvania Securities Division:

1. Item 4, Client Assets Under Management, have been amended to disclose current (within the past 90 days) asset under management calculation.
  2. Item 4 and Item 5 have been amended to add Variable Annuity Management as an advisory service offered to clients.
  3. Item 4 and Item 5 have been amended to add ERISA 3(21) as an advisory service offered to clients.
  4. Item 5 has been amended to disclose that a client may cancel within five (5) business days without penalty.
  5. Item 5 has been amended to disclose in greater detail the fees that are charged in advance and providing a refund.
  6. Item 12 "Best Execution" has been amended to include that fiduciary responsibility applies to non-discretionary accounts, as well as discretionary.
  7. Item 14 has been amended to remove reference to the firm having solicitor arrangements.
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### **Full Brochure Available**

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

## Item 3: Table of Contents

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## Item 4: Advisory Business

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### **Firm Description**

StrataCore Capital Management, LLC ("SCM") was founded in April 2014 and began offering advisory services in May 2014. SCM is owned by StrataCore Partners, LLC.

SCM provides investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate conservation.

SCM does not act as a custodian of client assets.

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

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. Conflicts of interest will be disclosed to the client in the event they should occur.

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### **Types of Advisory Services**

#### ASSET MANAGEMENT

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

#### Discretionary

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

#### Non-discretionary

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

#### ERISA PLAN SERVICES

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

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

made in their plan, though using SCM can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

- Provide non-discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options.
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide non-discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.

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 SCM 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, SCM is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. SCM 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 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.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

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

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

1. Employer securities;
2. Real estate (except for real estate funds or publicly traded REITs);

3. Stock brokerage accounts or mutual fund windows;
4. Participant loans;
5. Non-publicly traded partnership interests;
6. Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
7. Other hard-to-value or illiquid securities or property.

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

#### VARIABLE ANNUITY MANAGEMENT

SCM offers discretionary direct asset management services to advisory clients on their variable annuities products based on a percentage of Assets Under Management as described in further detail in Item 5.

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

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

Agreements may not be assigned without written client consent.

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#### **Wrap Fee Programs**

SCM does not sponsor any wrap fee programs.

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#### **Client Assets under Management**

As of November 9, 2015 SCM had approximately \$14,000,000 client assets under management on a non-discretionary basis and \$1,000,000 on a discretionary basis.

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

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

##### ASSET MANAGEMENT

Fees for these services will be based on a percentage of Assets Under Management as follows:

<b>Assets Under Management</b>	<b>Annual Fee</b>	<b>Quarterly Fee</b>
Up to \$1,000,000	1.25%	.25%
Over \$1,000,000	negotiable	negotiable

The annual fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in advance based on the amount of assets managed as of the last business day of the quarter. Quarterly advisory fees will be deducted from the clients' account by the custodian. 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 and without penalty. Clients may terminate advisory services with written notice. The client will be entitled to a pro rata refund for the days service was not provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees and client will acknowledge, in writing, any agreement of increase in said fees.



### ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets and will not exceed 1%. Fees are charged quarterly in 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 quarter. If the services to be provided start any time other than the first day of a quarter, the fee will be prorated based on the number of days remaining in the quarter. If this Agreement is terminated prior to the end of the fee period, SCM shall be entitled to a prorated fee based on the number of days during the fee period services were provided.

The compensation of SCM 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. SCM does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, SCM will disclose this compensation, the services rendered, and the payer of compensation. SCM will offset the compensation against the fees agreed upon under this Agreement.

### VARIABLE ANNUITY MANAGEMENT

The fees for these services will be based on a percentage of Assets under Management as follows:

<b>Assets Under Management</b>	<b>Annual Fee</b>	<b>Quarterly Fee</b>
Up to \$1,000,000	1.25%	.25%
Over \$1,000,000	negotiable	negotiable

Fees will be paid quarterly in advance. The fees are non-negotiable and the final fee schedule will be attached in the investment advisory contract. In the event of termination of the Account, client will be entitled to a pro rata refund for the days service was not provided in the final quarter. This final fee will be deducted from the Account prior to transfer. Client shall be given thirty (30) days prior written notice of any increase in fees.

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### **Client Payment of Fees**

Investment management fees are billed quarterly in advance, meaning we bill you before the three-month period has started. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

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### **Additional Client Fees Charged**

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

SCM, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of

assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure. Clients may request to terminate their Investment Advisory Agreement with SCM by providing advance written notice. The client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, SCM will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter.

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**Prepayment of Client Fees**

Investment management fees are billed quarterly in advance.

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

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

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

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**Sharing of Capital Gains**

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

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

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**Item 7: Types of Clients**

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**Description**

SCM generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

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**Account Minimums**

SCM does not require a minimum to open an account.

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

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**Methods of Analysis**

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

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

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

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## **Investment Strategy**

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

Other strategies may include long-term purchases, short-term purchases and trading,.

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## **Security Specific Material Risks**

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

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

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

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

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

### **Administrative Enforcement Proceedings**

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

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

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

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

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

Neither SCM nor any of its employees are registered representatives of a broker-dealer.

### **Futures or Commodity Registration**

Neither SCM 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**

Investment Advisor Representatives of SCM may also be licensed as independent insurance agents for various insurance companies. Less than 5% of their time is typically spent in his/her insurance practice. From time to time, they will offer clients advice or products from those activities. Therefore, they will be able to purchase products for any client in need of such services.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that SCM has a fiduciary responsibility to place the best interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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

SCM does not recommend or select other investment advisors.

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

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### **Code of Ethics Description**

The employees of SCM have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of SCM employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of SCM. The Code reflects SCM 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. SCM does 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 SCM clients.

SCM 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 SCM 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.

SCM' Code is based on the guiding principle that the interests of the client are our top priority. SCM' 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.

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

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

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

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

SCM 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 SCM with copies of their brokerage statements.

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

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

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

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## **Item 12: Brokerage Practices**

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

SCM may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. SCM will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. SCM

relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by SCM

- *Directed Brokerage*

In circumstances where a client directs SCM to use a certain broker-dealer, SCM still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: SCM's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients and conflicts of interest arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. SCM does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by SCM from or through a broker-dealer in exchange for directing client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, SCM receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of SCM. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when SCM receives soft dollars. This conflict is mitigated by the fact that SCM has a fiduciary responsibility to act in the best interest of its clients and the services received are beneficial to all clients.

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

SCM may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trades cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular client accounts. For example, a partial fill will generally be filled pro-rata among participating accounts. Prior to entry of a block trade, a written pre-allocation will be generated which identifies the group of client accounts participating in the order.

Changes in allocation prior to final allocation may be made for good cause provided that all client accounts receive fair and equitable treatment. A written explanation of the reason for any material change in the allocation must be provided to and approved by the Compliance Officer no later than the morning following the execution of the trade. If the change in the

allocation is the result of a condition that exists or a change in the client's account outside of the portfolio manager's control, then approval by the Compliance Officer is not required.

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

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

Account reviews are performed quarterly by Investment Advisor Representatives of SCM. Account reviews are performed more frequently when market conditions dictate

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

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

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

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

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

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

SCM does not receive any economic benefits from external sources.

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

SCM does not compensate for client referrals.

## **Item 15: Custody**

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### **Account Statements**

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

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

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

Generally, Clients grant SCM complete discretion over the selection and amount of securities to be bought or sold for their account (within the parameters established by their Advisory Agreement) without obtaining their consent or approval. However, these purchases may be subject to specified investment objectives and guidelines. For example, a Client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio.

Discretionary authority will only be authorized upon full disclosure to the client and by that client specifically authorizing said authority through the execution of an Investment Advisory Agreement. All discretionary trades made by SCM on behalf of their discretionary accounts (clients) will be in accordance with that client's investment objectives and goals.

Our primary objective in placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. SCM will execute its transactions through an unaffiliated broker-dealer. The broker-dealer will be chosen based on the following: 1) the broker's capital depth, 2) the broker's market access, 3) the broker's transaction confirmation and account statement practices, 4) our knowledge of negotiated commission rates and spreads currently made available, 5) the nature and character of the markets for the security to be purchased or sold, 6) the desired timing of the transaction, 7) the execution, 8) clearance and settlement capabilities of the broker selected and others considered, 9) our knowledge of any actual or apparent operational problems of a broker and 10) the reasonableness of the commission or its equivalent for the specific transaction. We will not necessarily pay the lowest commission or commission equivalent. Transactions may involve specialized services on the part of the broker.

This would justify higher commissions (or their equivalent) than other transactions requiring routine services.

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

### **Proxy Votes**

SCM 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, SCM will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

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## **Item 18: Financial Information**

### **Balance Sheet**

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

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

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

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

Neither SCM nor its management has had any bankruptcy petitions in the last ten years.

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## **Item 19: Requirements for State Registered Advisors**

**Education and business background, including any outside business activities and disclosable events for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).**

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

None to report



ITEM 1 COVER LETTER

**SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

Robert J. DeSalvo

**StrataCore Capital Management, LLC**

**Office Address:**  
349 5<sup>th</sup> Avenue  
Suite 414  
New York, NY 10016

Tel: 646-846-6500  
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This brochure supplement provides information about Robert J. DeSalvo and supplements the StrataCore Capital Management, LLC's brochure. You should have received a copy of that brochure. Please contact Robert J. DeSalvo if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Robert J. DeSalvo (CRD#4684246) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**NOVEMBER 9, 2015**

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

### Supervised Person Brochure

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#### Principal Executive Officer

**Robert J. DeSalvo**

- Year of birth: 1967
- 

#### Item 2 Educational Background and Business Experience

##### Educational Background:

- Penn State University; M.B.A, International Business and Management; 08/1992
- Penn State University; B.A., Business; 05/1989

##### Business Experience:

- StrataCore Capital Management, LLC; Partner/Chief Compliance Officer/Investment Advisor Representative; 2014-Present
  - Sole Proprietor; Insurance Agent; 03/2003-Present
  - John Carris Investments, LLC; Director; 12/2011-05/2014
  - Janney Montgomery Scott, LLC; Financial Advisor; 03/2003-12/2011
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#### Item 3 Disciplinary Information

None to report

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#### Item 4 Other Business Activities

Robert DeSalvo has a financial industry affiliated business as an insurance agent. From time to time, he will offer clients advice or products from those activities. Less than 5% of his time is spent on this business. He may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. DeSalvo has a fiduciary responsibility to place the best interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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#### Item 5 Additional Compensation

Robert DeSalvo receives additional compensation in his capacity as an insurance agent, but he does not receive any performance based fees.

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#### Item 6 Supervision

Since Mr. DeSalvo is the Chief Compliance Officer of SCM he is ultimately responsible for all supervision and formulation and monitoring of investment advice offered to clients.

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#### Item 7 Requirements for State-Registered Advisors

*Arbitration Claims:* None

*Self-Regulatory Organization or Administrative Proceeding:* None

*Bankruptcy Petition:* None

ITEM 1 COVER LETTER

**SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

Olov Mikael Alexander Larsson

**StrataCore Capital Management, LLC**

**Office Address:**  
349 5<sup>th</sup> Avenue  
Suite 414  
New York, NY 10016

Tel: 646-846-6500  
Fax: 917-338-4436

[www.stratacore.net](http://www.stratacore.net)  
[Mikael@stratacore.net](mailto:Mikael@stratacore.net)

This brochure supplement provides information about Olov Mikael Alexander Larsson and supplements the StrataCore Capital Management, LLC's brochure. You should have received a copy of that brochure. Please contact Olov Mikael Alexander Larsson if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Olov Mikael Alexander Larsson (CRD#6170304) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**NOVEMBER 9, 2015**

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

### Supervised Person Brochure

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#### Principal Executive Officer

Olov Mikael Alexander Larsson

- Year of birth: 1986
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#### Item 2 Educational Background and Business Experience

##### Educational Background:

- New York University; Double Bachelor in Economics and Studio Art; 2012

##### Business Experience:

- StrataCore Capital Management, LLC; Partner/Investment Advisor Representative; 12/2014 – Present
  - Unemployed/Travel; 08/2014 – 11/2014
  - StrataCore Capital Management, LLC; Personal Financial Advisor; 04/2014 – 08/2014
  - John Carris Investments, LLC; Registered Representative; 09/2013 – 04/2014
  - John Carris Investments, LLC; Registered Representative; 02/2013 – 07/2013
  - Unemployed; 05/2012 – 02/2013
  - New York University; Student; 08/2009 – 05/2012
  - Hunter College; Student; 08/2007 – 05/2009
  - Les Elfes; Ski Instructor; 01/2007 – 04/2007
  - Sorbonne University; Student; 08/2006 – 12/2006
  - Enskilda Gymnasiet; Student; 08/2005 – 06/2006
  - NYC Museum High School; Student; 08/2004 – 05/2005
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#### Item 3 Disciplinary Information

None to report

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#### Item 4 Other Business Activities

None to report.

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#### Item 5 Additional Compensation

Mikael Larsson does not receive any additional compensation and does not receive any performance based fees.

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#### Item 6 Supervision

Mikael Larsson is supervised by Robert DeSalvo, Chief Compliance Officer of StrataCore Capital Management, LLC. Mr. DeSalvo is ultimately responsible for all supervision. He reviews Mikael's work through client account reviews, quarterly personal transaction reports as well as face-to-face interactions. Mr. DeSalvo can be reached at 212-243-1008 or email at [robert@stratacoremgmt.com](mailto:robert@stratacoremgmt.com).

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#### Item 7 Requirements for State-Registered Advisors

*Arbitration Claims:* None

*Self-Regulatory Organization or Administrative Proceeding:* None

*Bankruptcy Petition:* None