

# SGIM

Strategic Growth Investment Management

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**Form ADV Part 2A  
Firm Brochure  
May 6, 2019**

This Brochure provides information about the qualifications and business practices of SGIM Inc.. If you have any questions about the contents of this Brochure, please contact us at (855)951-1800 or via email at [support@sgim.com](mailto:support@sgim.com). 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.

SGIM Inc. is a registered investment advisory firm. Registration of an investment advisory firm does not imply a particular level of skill or training.

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

## **SGIM Inc.**

**IARD#291173**

42 Broadway, 12th Floor

New York, NY 10004

855-951-1800

[support@sgim.com](mailto:support@sgim.com)

[www.sgim.com](http://www.sgim.com)

## 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 our Firm Brochure. This Item discusses only specific material changes that are made to this Brochure and provides our clients with a summary of such changes.

### Material Changes since the Last Update

Item 4 to the addition of a hedge fund, changing of portfolio structures and change in AUM;

Item 5 there has been a change to the fee schedule and the billing procedures. Also, to include the hedge fund fee structure;

Item 6 this has been amended to include the activities of the Hedge fund;

Item 14 has been amended to reflect the use of client referrals.

Item 15 has been amended to disclose custody over SGIM Alpha Fund, LP.

### Full Brochure and Additional Information

Full Brochure and additional information about SGIM Inc. are available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with us who are registered or are required to be registered, as investment adviser representatives ("IAR").

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## **Advisory Business**

### **FIRM INFORMATION**

SGIM Inc. ("SGIM," "we," "us," "our"), a Corporation formed in October of 2017, is a registered investment advisory firm located in New York, NY. We have been a registered investment advisory firm since December 14<sup>th</sup>, 2017.

### **PRINCIPAL OWNERS**

SGIM is owned and controlled by Adam Forbes, Chief Investment Officer and Mitchell Wonboy, President & Chief Compliance Officer

### **INVESTMENT ADVISORY SERVICES**

#### **Asset Management Services:**

SGIM is a financial technology investment manager that utilizes an algorithmic portfolio allocation, construction and investment process, eliminating human biases and focusing entirely on empirical data. The goal is that the end result makes the portfolio construction, allocation, risk and money management process more efficient.

The core mission of SGIM is to offer our clients a superior customer experience by simply putting our client's interest above our own.

SGIM only invests on behalf of their clients in public equities and exchange traded funds. The asset allocation process begins with prospective clients answering several questions in order to determine the appropriate mix of stocks and bonds that should exist within their investment portfolios. Next, SGIM recommends an asset allocation plan and once agreed to, we proceed in building and managing the client's portfolio.

SGIM also General Partner and Investment Manager of the SGIM Alpha Fund, LLC. (the "Fund") this is a pooled investment vehicle. In providing discretionary investment management services to the Fund, SGIM will utilize a tactical asset allocation strategy, trading primarily in individual securities to include the long and shorting of positions. Clients investing in the Fund will be admitted as limited partners.

### **CLIENT INVESTMENT OBJECTIVES/RESTRICTIONS**

As stated above, the SGIM asset allocation process begins with prospective clients answering several questions in order to determine the appropriate mix of stocks and bonds that should exist within their investment portfolios. SGIM clients are given the following three portfolio options in order to determine the appropriate benchmark to be applied to their account: 1. United States only portfolio, 2. Global portfolio, and 3. a Socially Responsible portfolio. When the market indicators trigger the our bear market strategy, the underlying investments may not adhere to the three portfolio options. This is to better protect capital during market downturns.

When creating client portfolios, SGIM recommends one of four allocation structures: 1. 100% equity, 2. 70% equity/30% bonds, or 3. 30% equity/70% bonds. If a client is unhappy with the SGIM

recommendation, he or she has the option to override the SGIM recommendation and choose which of the three structures best suits his or her needs.

### **WRAP FEE PROGRAMS**

We do participate in a wrap fee program. Please refer to ADV Part2A Appendix 1 Wrap Fee Brochure.

### **ASSETS UNDER MANAGEMENT**

As of 12/31/2018, SGIM manages \$ 6,556,601.00, on a discretionary basis

## **ITEM 5**

# **Fees and Compensation**

### **ANNUAL FEES FOR ADVISORY SERVICES**

SGIM is compensated for providing asset management services by charging a negotiable fee based on the total assets under management. The fees and billing will be pre-determined in writing in the Investment Advisory Agreement executed by you and SGIM.

The below ranges are the standard fee ranges that are typically charged.

Asset Management Fee Schedule	
\$0 - \$1,000,000	0.70%
\$1,000,001 - \$5,000,000	0.65%
\$5,000,001- \$10,000,000	0.60%
\$10,000,000 +	0.50%

### **FEE BILLING & PAYMENT**

Our asset management fees are annual fees and may be negotiable. Asset management fees are paid monthly in advance. Payments are due on the first day of the calendar month and are based on the account's asset value as of the last business day of the prior calendar month multiplied by the applicable annual rate and divided by twelve (12) The fee for the prior month is billed and payable within ten (10) days after the end of the prior month, based on the value of Client's account on the last business day of that month. We will deduct our asset management fee only when in receipt of your written authorization by executing an investment advisory agreement permitting the fees to be paid directly from your account. The qualified custodian will deliver an account statement to you at least monthly which will show all disbursements from your account. We urge you to review all statements for accuracy.

### **TERMINATION OF AGREEMENT**

Either party may terminate the investment advisory agreement at any time. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable up to and including the effective date of termination.

Notwithstanding the above, if we do not deliver the appropriate disclosure statement to you at least 48 hours prior to you entering into any written or oral advisory contract with this us, then you have the right to terminate the contract without penalty within five (5) business days after entering into the contract.

### **OTHER EXPENSES AND FEES**

The fees discussed above include payment solely for the investment advisory services provided by SGIM and are separate to certain fees or charges that are imposed by third parties in connection with investments made on your behalf for your account. Third-party fees may include markdowns, markups, brokerage commissions, other transaction costs and/or custodial fees.

All fees paid to SGIM for asset management services are separate from the expenses charged by exchange-traded funds to their shareholders. These fees and expenses will be used to pay management fees for the funds, other fund expenses, account administration, and a possible distribution fee. You should review both the fees we charge and the fees charged by the Exchange Traded Funds to understand the total fees to be paid fully.

### **OTHER COMPENSATION**

The Adviser nor its principals receive other compensation.

## **ITEM 6**

# **Performance-Based Fees and Side-By-Side Management**

### **PERFORMANCE-BASED FEES**

SGIM Alpha LLC, a pooled investment vehicle charges a performance-based fees which are fees based on a share of capital gains on or capital appreciation of the assets of a client. Our Performance Allocation is a performance-based fee which is a fee based on a share of capital gains on or capital appreciation of the assets of a client. The specific Performance Allocations are outlined in Item 5 above.

Generally, at the end of each fiscal year, subject to the loss recovery provisions and performance hurdle discussed below, for specific allocations outlined in Item 5 above (i) each capital account balance as of the end of such fiscal year (determined prior to giving effect to the performance allocation, and as adjusted for contributions to and withdrawals from such capital account during such fiscal year) over (ii) each capital account balance as of the beginning of such fiscal year (such excess, the “Net Capital Appreciation”), will be deducted from each capital account and reallocated to the capital account of the General Partner. The forgoing performance hurdle is calculated on an annual basis, pro-rated for partial years, and shall not be compounded from year to year. The General partner reserves the right to waive fees for certain related persons.

### **SIDE-BY-SIDE MANAGEMENT**

Receiving a performance-based fee creates an incentive for SGIM to make investments that are riskier or more speculative than would be the case in the absence of those performance-based arrangements. Such fee arrangements could also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. However, SGIM has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to mitigate this conflict from influencing the allocation of investment opportunities among clients.

## ITEM 7

# Types of Clients

We provide our investment advisory services to:

- Individuals
- High Net Worth Individuals
- Other business entities

Our minimum account size is \$10,000 for our asset management services.

## ITEM 8

# Methods of Analysis, Investment Strategies, and Risk of Loss

## METHODS OF ANALYSIS

Our algorithms use various methods of analysis and investment strategies including the following:

**Fundamental Analysis** – We evaluate economic and financial factors to determine if a security may be underpriced, overpriced or fairly priced. This method entails assessing a security by attempting to determine its intrinsic value by examining related financial, economic, and other qualitative and quantitative factors. Fundamental analysis requires an in-depth look at multiple factors that can affect the security's value, from macroeconomic factors (like the overall economy and industry conditions) to individually specific factors (like the financial situation and management of companies). The overall objective of performing the fundamental analysis is to determine a value that an investor can use to determine what sort of position to take with that security. This method of security analysis is contrary to technical analysis. Fundamental analysis involves using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

**Technical Analysis** – This method involves the evaluation of securities by performing an analysis of statical information that is generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value but instead, use charts and other tools to determine the patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

## INVESTMENT STRATEGIES

When formulating investment algorithms, we will use the following investment strategies. There are inherent risks associated with each of these strategies.

SGIM uses investment benchmarks as a framework for constructing client portfolios, and monitoring portfolio performance by comparing rates of return over time. SGIM can adjust its investment strategy for each client as appropriate depending on market conditions. In general, SGIM's clients are high-net-worth individuals that are invested in equity, fixed income or a combination of both based on their individual financial goals and objections, restrictions or investment limitations. If SGIM's model forecasts a prolonged downturn in equity markets, it may adopt a defensive strategy for client's equity accounts by investing substantially in fixed income exchange traded funds. This defensive positioning is built into our

algorithm and will naturally take place during different market cycles. The intent is to reduce volatility and capture less equity market downside participation.

## POTENTIAL RISKS

Investing involves different levels of risk that can result in loss of any profits and/or principal you have not realized. We manage your account in a manner consistent with your pre-determined risk tolerance and suitability profile. However, we cannot guarantee that our efforts will be successful. Investing in securities involves the risk of loss clients should be prepared to bear.

### Investing involves the assumption of risk including:

**Algorithm Risk:** SGIM utilizes proprietary algorithms to manage the active portion of clients portfolios. Its algorithms do not consider any inputs other than what is generated by the author of the algorithms. No third parties are involved in the construction or amendments of the algorithms. Algorithms are, however, subject to human error. While SGIM strives to avoid this error, it is impossible to eliminate it entirely

**Financial Risk:** which is the risk that the companies we recommend to you perform poorly, which affect the price of your investment.

**Market Risk:** which is the risk that the stock market will decline, decreasing the value of the securities we recommend to you with it.

**Inflation Risk:** which is the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.

**Political and Governmental Risk:** which is the risk that the value of your investment will be affected by the introduction of new laws or regulations.

**Interest Rate Risk:** which is the risk that the value of the investments we recommend to you will fall if interest rates rise.

**Industry Risk:** which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.

## ITEM 9

## Disciplinary Information

As of the date of this brochure, we have not been subject to any disciplinary, legal, or regulatory events related to past or present investment clients. There has been no disciplinary, legal, or regulatory events related to us or any of our management persons.

## ITEM 10

## Other Financial Activities and Affiliations

### FINANCIAL INDUSTRY ACTIVITIES

Neither SGIM nor its management persons are registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

Neither SGIM nor its management persons are registered or has an application pending to register as a futures commission merchant, commodity pool operator or commodity trading advisor.



## **AFFILIATIONS**

Adams Forbes is the Chief Investment Officer of SGIM. In October 2015, Mr. Forbes established a pooled investment vehicle named Lume ALPHA, LP, a Delaware limited partnership ("Lume ALPHA"). In January 2018, Lume ALPHA was renamed by the newly appointed General Partner, SGIM and subsequently named SGIM ALPHA, LP. SGIM ALPHA currently has few investors, of which Mr. Forbes is one, but may add other investors in the future.

## **SELECTION OF OTHER INVESTMENT ADVISERS**

We do not recommend or select other investment advisers for our clients.

### **ITEM 11**

## **Code of Ethics, Participation in Client Transactions and Personal Trading**

### **CODE OF ETHICS**

SGIM has developed a code of ethics that will apply to all of our supervised persons. We and our IARs must act in a fiduciary capacity when providing investment advisory services to you. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. SGIM has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle of our code of ethics, which also covers our insider trading, and personal securities transactions policies and procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will acknowledge that they have read, understand and agree to comply with our Code of Ethics.

Our Code of Ethics is available to clients and prospective clients upon request.

### **RECOMMENDATIONS INVOLVING A MATERIAL FINANCIAL INTEREST**

Neither we nor any related person recommend to clients, or buys or sells for clients' accounts, securities in which we or a related person has a material financial interest.

### **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

There may be instances where an IAR will recommend to investment advisory clients or prospective clients the purchase or sale of securities in which an IAR, its affiliates or other clients may also have a position or interest. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis. Generally, in such circumstances, the affiliated and client accounts will share execution costs equally. Completed trade orders will be allocated according to the instructions from the initial trade order. Partially filled trade orders will be allocated on a pro-rata basis. Any exceptions will be explained in the trade order.

### **PERSONAL TRADING**

Employees are permitted to have personal securities accounts as long as personal investing practices are in line with fiduciary standards and regulatory requirements, and do not conflict with their duty to SGIM and our clients. SGIM monitors and controls personal trading through pre-approval of all personal securities transactions or blackout periods imposed upon employees trading in the same securities as

SGIM. We forbid any officer or employee, either personally or on behalf of others, to trade on material, nonpublic information or to communicate such information to others in violation of the law.

## **ITEM 12 Brokerage Practices**

SGIM currently has arrangements with Apex Clearing Corporation and Interactive Brokers LLC (the “Custodians”) these are unaffiliated qualified custodians whereby SGIM would suggest you custody your accounts. Apex Clearing Corporation and Interactive Brokers LLC are independent SEC-registered broker-dealers and members of FINRA and SIPC.

Custodians may charge commissions and other fees to clients for their services, however SGIM does not participate in these or any other commission arrangements between a client and their custodian. SGIM assumes all of the transaction expenses for the trading platforms. However, Apex may receive orderflow rebates from client transactions.

### **RESEARCH AND OTHER SOFT DOLLAR BENEFITS**

We do not receive soft dollar benefits from broker-dealers.

### **BROKERAGE FOR CLIENT REFERRALS**

We do not receive client referrals from broker-dealers.

### **DIRECTED BROKERAGE**

We do not permit clients to direct us to executed transactions through a specific broker-dealer other than those we recommend.

### **TRADE AGGREGATION**

We attempt to allocate trade executions in the most equitable manner possible. We may aggregate orders in order to obtain best execution. In aggregated orders, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

## **ITEM 13 Review of Accounts**

### **PERIODIC REVIEWS**

We review asset management accounts no less than annually. Accounts are reviewed to evaluate asset allocation, investment strategy and objectives, cash balance, and performance..

## **ITEM 14 Client Referrals and Other Compensation**

In the course of its business, SGIM may enter into written third-party agreements with members of the financial services community (the “Solicitors”) pursuant to which such Solicitors will solicit Clients on behalf of SGIM. Any fees paid to a Solicitor shall be a referral fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act, and any corresponding state securities law requirements. If a Solicitor introduces a Client to SGIM, that Solicitor will disclose the nature of the Solicitor relationship with SGIM at the time of the solicitation. In addition, the Solicitor will provide each prospective Client with a copy of this Disclosure Brochure, and a copy of a written disclosure statement from the Solicitor to the Client, disclosing the terms and conditions of the arrangement between the Solicitor and SGIM, including the

compensation the Solicitor will receive from SGIM. This compensation shall in no way affect the fee schedule applicable to Clients outlined in Item 5 of this Brochure.

## ITEM 15

### Custody

We are deemed to have custody of client funds and securities due to our ability to deduct management fees from clients' accounts and because we act as the General Partner to the SGIM Alpha Fund, giving us and/or our supervised persons legal ownership of or access to client funds or securities of that limit partnership. Pursuant to the regulations, we must direct a qualified custodian to send the account statements required under SEC's custody rule, to each limited partner invested in the SGIM Alpha Fund. Interactive Brokers serves as the qualified custodian for the Fund and its underlying capital accounts and will provide such account statements. We will not assign or transfer trading authorization to another advisor. Clients will receive account statements from the qualified custodian(s) holding their funds on a monthly basis. The custodian's account statements will indicate the amount of our advisory fees deducted from the clients' account(s) each billing period. These statements should be carefully reviewed by the client for accuracy. Item 5 – Fees and Compensation has additional information regarding our ability to deduct management fees from clients' accounts.

## ITEM 16

### Investment Discretion

#### DISCRETIONARY AUTHORITY FOR TRADING

If you are participating in our asset management services, upon receiving your written authorization via our executed investment advisory agreement, we will maintain trading authorization over your designated account and may also implement trades on a discretionary basis.

When discretionary authority is granted, we will have the limited authority to determine the type of securities to be purchased, sold or exchanged and a number of securities that can be bought, sold or exchanged for your portfolio without obtaining your consent for each transaction.

## ITEM 17

### Voting Client Securities

SGIM will vote by proxy or otherwise on all matters for which a shareholder vote is solicited by, or concerning, issuers of securities beneficially held in client's accounts in such a manner as SGIM deems appropriate. SGIM does reserve the right to abstain from voting. SGIM clients delegate to SGIM the authority to receive and vote all proxies and related materials for any security held in SGIM accounts. SGIM will do so in a way that is reasonably expected to ensure that proxy matters are conducted in the best interest of clients.

## ITEM 18

### Financial Information

We are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

We are currently not in, nor have been historically in a financially precarious situation or the subject of a bankruptcy petition.