



Protective Strategies

Asset Management

Form ADV Part 2A

Firm Brochure

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01/30/2019

This brochure provides information about the qualifications and business practices of Protective Strategies Asset Management LLC. If you have any questions about the contents of this brochure, please contact us at 917-748-2888 and/or zubinpsam@gmail.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.

Additional information about Protective Strategies Asset Management LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

We are a registered investment adviser with the U.S. Securities and Exchange Commission. The use of the terms "registered investment adviser" or "registered" by us does not imply by itself any level of skill or training. The oral and written communications we provide to you, including this brochure, is information you can use to evaluate us (and other advisers), which are factors in your decision to hire us or to continue to maintain a mutually beneficial relationship.

ITEM 2 MATERIAL CHANGES

This is the initial filing of the Protective Strategies Asset Management LLC Form ADV Part 2A.

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ITEM 4 ADVISORY BUSINESS

Protective Strategies Asset Management LLC ("the firm", or "we") is a proposed registered investment adviser with the Securities and Exchange Commission ("SEC") based in Forest Hills, New York and serves private clients in the U.S. only. The firm's only employee is its founder, Mr. Zubin Hodiwalla. There are no other principals or employees. The firm is an entity with one individual, Zubin Hodiwalla, executing all functions related to its principal business of non discretionary investment management. The entity is a Limited Liability Corporation formed under the laws of the State of New York.

As of December 31, 2018, Protective Strategies Asset Management LLC had \$0 in regulatory assets under management because it is a newly formed entity. The amount of assets anticipated to be managed on a non discretionary basis is expected to be approximately \$150 million.

The firm's investment philosophy is as follows. We believe in focusing on the reduction of portfolio volatility. Volatility drives many investors to abandon their asset allocations and time the markets. We offer various equity and fixed income strategies to help manage volatility while seeking to preserve and grow wealth over the long term.

We will work with a client to accommodate investment guidelines and restrictions so long as they do not interfere materially with the firm's ability to implement the investment and portfolio construction process.

The firm's research philosophy employs a bottom-up, fundamental research approach to security selection. We utilize Exchange Traded Funds and mutual funds as primary investment vehicles but include individual securities when we believe it is warranted. Portfolios can be comprised of equity related funds or individual stocks, fixed income related funds or individual bonds or a combination thereof. The firm does not use any alternative investments, private securities, insurance products, structured products, options, futures, derivatives or any non traditional asset classes.

The firm does not provide any service other than non-discretionary investment management. We currently do not offer any financial planning services or "wrap" accounts. We do not serve as an attorney, accountant, or insurance agency, and no portion of our services should be construed as legal or accounting services. Accordingly, we do not prepare estate planning documents, tax returns or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.). Clients are reminded that they are under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation made.

We work closely with our clients to ensure that their goals and objectives are met. We customize each client's portfolio to reflect their unique circumstances. We do not offer a "one size fits all" approach where "model" portfolios are used. Any client-imposed limitations or guideline restrictions are defined and outlined in the client's initial documentation with the firm and updated as necessary.

We intend to custody all client assets at our designated custodian, Charles Schwab & Co., Inc.

ITEM 5 FEES AND COMPENSATION

STANDARD FEE SCHEDULE FOR PRIVATE CLIENTS

We advise on assets for private clients seeking non-discretionary portfolio management services. Each client receives personalized investment guidance based on an analysis of the client's financial circumstances, income requirements, risk tolerance, investment objectives and other pertinent factors.

Clients generally pay advisory fees based on a percentage of assets in their account(s). Fees are not typically negotiated. However, fees may be negotiated depending on the particular circumstances of the client, scope of services provided, size of account(s), service levels, reporting and other arrangements as agreed with specific clients. In those instances, a client may pay more or less than the fees on our standard fee schedules, and more or less than similar clients.

Although we generally accept clients with \$5 million of investable assets or more, from time to time we will accept clients of smaller assignments depending on the client relationship, client service requirements and certain circumstances.

We bill our clients on a quarterly basis. Fees assessed by Protective Strategies Asset Management LLC do not include fees for services performed by our custodian, Charles Schwab & Co., Inc.

Provided below is the standard annual fee schedule for the investment management services we currently offer for Private Clients:

PRIVATE CLIENT PORTFOLIOS GREATER THAN \$5 MILLION

.25% on all assets under management

The minimum annual fee is generally \$10,000.

FEE PAYMENT OPTIONS

There are two options clients may select to pay for our services:

Direct debiting (preferred): At the inception of the relationship and each quarter thereafter, we will notify the client's custodian of the amount of the management fee due and payable to us through our fee schedule and contract. If clients choose this method, they must provide written authorization to the custodian permitting our management fee to be paid directly from the account(s) held by an independent custodian. The custodian does not validate or check our fee or its calculation on the assets on which the fee is based. The custodian will deduct the fee from the account(s) or, if the client has more than one account, from the account designated to pay our advisory fees. Clients will receive statements directly from their custodian showing all transactions, positions and credits/debits into or from their account(s); the statements after the quarter-end will reflect these transactions, including the advisory fee paid by the client to us.

Pay-by-check or wire: At the inception of the relationship and each quarter thereafter, we will issue clients an invoice for our services. Clients will pay us by check or wire transfer upon receipt of the invoice date.

Fees may be payable in advance or arrears, depending on each client's agreement.

ADDITIONAL FEES AND EXPENSES

Advisory fees payable to us do not include all the fees the client will pay when we purchase or sell securities for the client's account(s). Our fee schedule does not include custody fees, brokerage charges, fund expenses or related transaction costs. All brokerage charges and related transaction costs are charged to the account(s) as they occur by our designated custodian.

All fees paid to us for portfolio advisory services are separate from the fees and expenses borne by any mutual funds or Exchange Traded Funds in which client assets may be invested. Fees associated with these vehicles are detailed in the corresponding prospectus and fund documents. It is common for different share classes to maintain different fees schedules. Certain fund share classes may receive more favorable fee structures.

There are many fees and/or expenses that clients may pay directly to third parties for any securities purchased, sold or held in their account(s) under our management. We do not receive, directly or indirectly, any of these fees charged to the client. They are paid to the client's custodian or the mutual fund(s) or other investment(s) the client holds. These fees may include brokerage commissions, transaction fees, exchange fees, regulatory fees, advisory fees and administrative fees charged by mutual funds, exchange traded funds, or transfer agents.

TERMINATED ACCOUNTS

In the event a client's investment advisory agreement is terminated, any fees paid in advance will be refunded on a pro rata basis as of the termination date. Similarly, any accounts that contractually pay management fees in arrears will be billed the pro-rata portion for the time the assets were under management.

FEES FROM FUNDS or Other Sources

We receive no other compensation other than the fees paid directly by the client. We do not engage in "soft dollar" revenue sharing agreements and do not accept fees from any source other than the client.

ITEM 6 PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Protective Strategies Asset Management LLC does not engage in the acceptance of performance based fees.

ITEM 7 TYPES OF CLIENTS

We generally provide investment management services to high net worth entities. These include:

High net worth individuals and families
Individual retirement plans
Trusts
Estates
Charitable Entities

Although we generally accept clients with a minimum of \$5 million of investable assets, from time to time we will waive the account minimum depending on the client relationship, client service requirements and other circumstances.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

As an investment adviser, we provide investment advisory services to clients through a variety of investment vehicles. These include mutual funds and Exchange Traded Funds. Different factors, including account type and size, may be used to determine which vehicle is most appropriate for the client. We do not utilize options, futures or derivatives.

We primarily utilize Fundamental analysis (analysis performed on historical and present data, with the goal of making financial forecasts) when making investment recommendations.

Equity Funds

As is consistent with our investment philosophy, we attempt to limit the selection of equity funds (mutual funds and/or Exchange Traded Funds) to those that have a history of exhibiting below average volatility when compared to the general equity benchmarks. Keeping fund expenses to a minimum is a secondary objective. We also consider a fund's operating history, fund manager, style correlation and third party ratings among other criteria.

Fixed Income Funds

As is consistent with our investment philosophy, we attempt to limit the selection of fixed income funds (mutual funds and/or Exchange Traded Funds) to those that have a history of exhibiting below average volatility when compared to the general fixed income benchmarks. Keeping fund expenses to a minimum is a secondary objective. We also consider a fund's operating history, fund manager, style correlation and third party ratings among other criteria.

Individual Stocks

As is consistent with our investment philosophy, we attempt to limit the selection of individual stocks to those that have a history of exhibiting below average volatility when compared to other stocks. These stocks may be limited to specific sectors such as consumer staples, healthcare and utilities.

Individual Fixed Income

As is consistent with our investment philosophy, we attempt to limit the selection of individual bonds to those that are investment grade and have maturities of 10 years or less. Issues are selected between government and corporate bonds depending on the type of account and client's tax profile.

INVESTMENT COMPANY AND ETF RISK

Investments in open-end and closed-end investment companies, including exchange traded funds ("ETFs") (which may, in turn, invest in bonds and other financial vehicles), involve substantially the same risks as investing directly in the instruments held by these entities. However, the investment may involve duplication of certain fees and expenses. By investing in an investment company or ETF, the client becomes a shareholder of that fund. As a result, investors in a strategy that invests in ETFs or an open-end or closed-end investment company are indirectly subject to the fees and expenses of the individual ETFs or funds.

INFORMATION SECURITY RISK

Our operations rely on effective information technology security and our ability to securely process the storage and transmission of confidential and other information. Although we employ protective measures to safeguard your personal and other information from unauthorized access or use, there is a risk of our computer systems, software, networks, mobile devices, and those of third parties upon whom we rely, being vulnerable to cyber-attacks, sabotage, unauthorized access, computer viruses, worms or other malicious code, and other events that have a security impact.

Allocation Philosophy

As an independent investment advisory firm, we are committed to serving our clients' needs and goals. To determine the appropriate asset allocation for a client, we begin with an analysis of each client's financial situation, risk tolerance and investment objectives and subsequently allocate the client's assets amongst the various investment vehicles previously described. We will always ask for a client's permission and obtain their approval prior to effectuating any transaction. We are a non discretionary advisor.

The firm's asset allocation goals seeks to meet a client's return, cash flow and risk tolerance criteria. It also takes into account other issues including: tax liability; income/yield requirements; real estate holdings; business objectives; time horizon; family/generational issues; single-stock risk; family issues; and philanthropic intentions. A client's asset allocation plan is reviewed and adjusted from time to time and takes into account changes in a client's financial and family circumstances.

We may utilize the following investment strategies when implementing investment advice given to clients:

Long Term Purchases (securities held at least a year)

Short Term Purchases (securities held less than a year)

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Protective Strategies Asset Management LLC) will be profitable or equal any specific performance level(s).

RISK OF LOSS

All investments in securities include a risk of loss of the principal invested amount and any profits that have not been realized. There is a risk that clients could lose all or a portion of their investment in any of the above-mentioned vehicles. An investment in a portfolio of securities is not a deposit in a bank and is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Financial markets fluctuate substantially over time. As recent global and domestic economic events have indicated, performance of any investment is not guaranteed.

Although we do our best to make recommendations that aim to mitigate the risks, there may be some risks that we cannot control. We cannot guarantee any level of performance or that clients will not experience a loss in their account assets. Please note that the risks described herein do not purport to be a complete explanation of all risks involved. Potential investors should read the prospectus or other disclosure documents in its entirety before investing in any individual securities, mutual funds or Exchange Traded Fund.

ITEM 9 DISCIPLINARY INFORMATION

Neither Protective Strategies Asset Management LLC nor its principal have been involved in any material legal or disciplinary events (i.e., criminal or civil action in a domestic, foreign or military court, administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any self-regulatory organization).

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

The firm does not have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. Nor do we ever intend to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

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. Our fiduciary duty is the underlying principle for our firm's Code of Ethics, which includes procedures for personal securities transaction and insider trading. Our firm requires its principal and any representative 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 with our firm, and at least annually thereafter, all representatives of our firm will acknowledge receipt, understanding and compliance with our firm's Code of Ethics. Our firm and representatives must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. If a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Our firm recognizes that the personal investment transactions of our representatives demands the application of a Code of Ethics with high standards and requires that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, our firm also believes that if investment goals are similar for clients and for the firm's representative(s), it is logical, and even desirable, that there be common ownership of some securities.

In order to minimize any potential conflict of interest, the firm's related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Further, our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day.

ITEM 12 BROKERAGE PRACTICES

Our firm does not maintain custody of client assets. Client assets must be maintained at our designated custodian - Charles Schwab & Co., Inc. ("Charles Schwab"). Charles Schwab is our only custodian and was selected based on a variety of factors including:

1. The owner of Protective Strategies Asset Management LLC, Zubin Hodiwalla, is a former employee of Charles Schwab and is familiar with their processes and operations.
2. Charles Schwab is the current custodian for what will be Protective Strategies Asset Management LLC's largest and first client.
3. As of December 31, 2018, Charles Schwab is the largest custodian for Registered Investment Advisors in the United States and has extensive experience servicing the needs of RIAs and their clients. They are uniquely qualified to provide the future clients of Protective Strategies Asset Management LLC with:

Timeliness of execution, timeliness and accuracy of trade confirmations, comprehensive research tools, comprehensive recordkeeping services, ability to access a variety of market venues, a stellar reputation and financial condition along with overall quality of services.

Charles Schwab may make certain research and brokerage services available at no additional cost to our firm. Research products and services may include: research reports on recommendations or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by Charles Schwab to Protective Strategies Asset Management LLC in the performance of our investment decision-making responsibilities. The aforementioned research and brokerage services qualify for the safe harbor exemption defined in Section 28(e) of the Securities Exchange Act of 1934.

Protective Strategies Asset Management LLC does not share in any brokerage commissions charged by Charles Schwab as part of client transactions. We do not receive "soft dollars" or any compensation other than what is directly paid by clients.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a custodian's services, including the value of research provided, execution capability, commission rates, and responsiveness. Although our firm will seek competitive rates, to the benefit of all clients, our firm may not necessarily obtain the lowest possible commission rates for specific client account transactions.

ITEM 13 REVIEW OF ACCOUNTS

We review client accounts on at least an annual basis. The nature of these reviews is to learn whether client accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Our firm does not provide written reports to clients. Verbal reports to clients take place on at least an annual basis.

Our firm may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

We do not provide any financial planning services, we do not advise on any matters outside of portfolio management. We do not produce any performance reports as all sources of account information are readily available from our designated custodian Charles Schwab.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

Protective Strategies Asset Management LLC receives certain benefits from Charles Schwab as a result of our decision to custody client assets at Charles Schwab. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. Some of the products and services made available by Charles Schwab may benefit our firm but may not benefit our client accounts. These products or services may assist us in managing and administering client accounts.

Our firm does not pay referral fees to anyone for the referral of clients to our firm in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940. We do not provide compensation to any entity in exchange for a client being referred to Protective Strategies Asset Management LLC.

ITEM 15 CUSTODY

Our firm does not have custody of client funds or securities. All of our clients receive account statements directly from Charles Schwab at least quarterly upon opening of an account. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial designation.

Should a client not desire to have Charles Schwab as their custodian, they cannot retain Protective Strategies Asset Management LLC. This stipulation is made for purposes of simplicity while taking into account the limited clientele expected to be served by Protective Strategies Asset Management LLC.

ITEM 16 INVESTMENT DISCRETION

Management services are provided on a non-discretionary basis only. We always contact the client before implementing any transactions in an account. Clients must accept or reject our investment recommendations, including (1) the security being recommended, (2) the number of shares or units and (3) whether to buy or sell. Once these factors are agreed upon, Protective Strategies Asset Management LLC is responsible for making decisions regarding the timing of the purchase or sale and the price at which it is bought or sold. Agreement can be made either verbally or in writing.

ITEM 17 VOTING CLIENT SECURITIES

Our firm does not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, our firm will forward them to the appropriate client and ask the party who sent them to mail them directly to the client in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

ITEM 18 FINANCIAL INFORMATION

Protective Strategies Asset Management LLC does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, Protective Strategies Asset Management LLC is not required to include a balance sheet for its most recent fiscal year. Protective Strategies Asset Management LLC is not subject to a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Finally, Protective Strategies Asset Management LLC has not been the subject of a bankruptcy petition at any time.