

**Part 2A of Form ADV: *Firm Brochure***

**Strategic Investment Advisors, Inc.**

132 N. First Street  
P.O. Box 1517  
Albemarle, NC 28002

Telephone: 704-983-5959  
Email: [mobrien@investsia.com](mailto:mobrien@investsia.com)  
Web Address: [www.strategicinvestmentadvisors.com](http://www.strategicinvestmentadvisors.com)

3/28/2013

This brochure provides information about the qualifications and business practices of Strategic Investment Advisors. If you have any questions about the contents of this brochure, please contact us at 704-983-5959 or [mobrien@investsia.com](mailto:mobrien@investsia.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 Strategic Investment Advisors also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 117592.

## **Item 2    Material Changes**

As a fiduciary, Strategic Investment Advisors, Inc. has the ongoing obligation to inform clients of any material information that could affect the advisory relationship. Since the last annual amendment filed on March 31, 2012, Strategic Investment Advisors, Inc. has had no material changes.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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## **Item 4    Advisory Business**

Strategic Investment Advisors, Inc. (SIA) is a SEC-registered investment adviser with its principal place of business located in North Carolina. Strategic Investment Advisors, Inc. began conducting business in 1993.

Listed below are the firm's principal shareholders, officers or members of the Investment Committee (i.e., those individuals and/or entities controlling 25% or more of this company, executive officers, or members of the Investment Committee):

- Christy Davis Stoner, CEO/Investment Committee/Director
- Martha Nan O'Brien, SVP Operations/CCO/Investment Committee
- Roger Lee Dick, CEO/President Uwharrie Capital Corp/ Investment Committee
- Jeffrey Michael Talley, President/Investment Committee
- Misty Whitley Thornburg, AVP/Data Manager/Investment Committee
- Lorelei Virginia Misenheimer, EVP Retirement Plan Services
- Uwharrie Capital Corp

Strategic Investment Advisors offers the following advisory services to our clients:

### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT USING MODEL PORTFOLIOS SIA MANAGED ACCOUNTS**

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we recommend a model portfolio based on these discussions. During our data-gathering process, we determine the client's individual investment objectives, time horizon, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition, resources and background. We develop a client's personal investment policy statement (IPS) that describes in writing the investor's long-term goals, investment restrictions, the investment guidelines for the portfolio, and the responsibilities of the investor and the advisor. All new accounts are presented to the Investment Committee for review. Once the Investment Committee determines the suitability of a portfolio, we recommend a portfolio to the customer, and the customer accepts this recommendation by signing the investment policy statement. The portfolio is managed based on the portfolio's goal. Clients, nevertheless, have the opportunity to place reasonable restrictions on the types of investments to be held in their account or the asset classes to be included in the model.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated goals and objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Our investment recommendations are not limited to any specific product or service offered by

a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange traded funds (ETFs)
- Corporate debt securities
- Mutual fund shares
- Options contracts on securities
- Options contracts on commodities
- Other - Absolute Return Account through an affiliate bank.

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

We can provide limited financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. This service is completed as part of the asset management process, and the client recommendations are included as part of the IPS developed for the client.

Our firm provides portfolio management services to clients using the following model asset allocation portfolios. Each model portfolio is designed to meet a particular investment goal. The models are sometimes adjusted to accommodate a customer restrictions or specific goals. The "Blend" portfolios have a portion of the portfolio invested in an Absolute Return account held at an affiliate bank and a portion invested in mutual funds or ETFs. The "Classic" portfolios are invested totally in the market except for a small percentage invested in cash or a cash equivalent.

**Stable Blend Portfolio** - Designed for the ultra conservative investor, one with an extremely low risk tolerance and/or short time horizon. It is targeted toward the investor seeking investment stability and liquidity from their investable assets. The main objective of the individual is to preserve capital, reduce volatility and provide income. A portion of this portfolio is invested in an Absolute Return account held at an affiliate bank.

**Conservative Blend Portfolio** - Designed for the cautious investor, one with a low risk tolerance and/or short time horizon. It is targeted toward the investor seeking investment stability and liquidity from the investable assets. The main objective of a person in the conservative range is to preserve capital while providing income. A portion of this portfolio is invested in an Absolute Return account held at an affiliate bank.

**Conservative Classic Portfolio** - Designed for the cautious investor, one with a low risk tolerance and/or short time horizon. It is targeted toward the investor seeking investment stability and liquidity from the investable assets. The main objective of a person in the conservative range is to preserve capital while providing income. This portfolio does not have an investment in an Absolute Return account.

**Moderate Conservative Blend Portfolio** - Designed for the investor who seeks both modest capital appreciation and income from the portfolio. This investor will have either a moderate time horizon and/or a higher risk tolerance than the conservative investor. A portion of this portfolio is invested in an Absolute Return account held by an affiliate bank.

**Moderate Conservative Classic Portfolio** - Designed for the investor who seeks both modest capital appreciation and income from the portfolio. The investor will have either a moderate time horizon and/or a higher risk tolerance than the conservative investor. This portfolio is not invested in an Absolute Return account.

**Moderate Blend Portfolio** - Designed for the investor who seeks relatively stable growth from the investable assets offset by a low level of income. An investor in the moderate risk range will have a higher tolerance for risk and/or a longer time horizon than any of the investors in the more conservative portfolios. The main objective of a person in this range is to achieve steady portfolio growth. A portion of this portfolio is invested in an Absolute Return account held by an affiliate bank.

**Moderate Classic Portfolio** - Designed for the investor who seeks relatively stable growth from the investable assets offset by a low level of income. An investor in the moderate risk range will have a higher tolerance for risk and/or a longer time horizon than any of the investors in the more conservative portfolios. This portfolio is not invested in the Absolute Return account.

**Moderate Aggressive Classic Portfolio** - Designed for the investor with a relatively high tolerance for risk and a longer time horizon. This investor has little need for current income and seeks above-average growth from the investable assets. The main objective of this risk range is capital appreciation.

**Aggressive Classic Portfolio** - Designed for the investor who has both a high tolerance for risk and a long investment time horizon. The main objective of the aggressive risk range is to provide high growth for the investor's assets without providing current income.

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client's financial circumstances, we will:

1. Attempt to meet semi-annually with each SIA Managed Account client and request any updated information regarding changes in the client's financial situation and investment objectives. If a meeting cannot be arranged, the information will be sent to the client by certified mail or overnight delivery.
2. Review the client's portfolio in the semi-annual meeting including the portfolio performance, the investments, the target asset allocations, and the current risk of the portfolio. We also discuss whether the client is comfortable with the risk of the portfolio and whether the client wishes to make any changes to withdrawals or contributions. After the meeting with the client, the account is reviewed closely by the Portfolio Manager and he/she may rebalance the account in order to bring the account more in line with the target allocations.
3. Be reasonably available to consult with the client.

4. Maintain client suitability information in each client's file.
5. Send a quarterly statement to each client and encourage the client to compare the statement with the quarterly statements sent by the custodians.
6. Review the account quarterly and rebalance if an asset class is in variance by 5% or more from the model portfolios target exposure to a particular asset class.

### **ASSET ALLOCATION AVENUE ACCOUNTS (AAA Accounts)**

The AAA Accounts are set up as a wrap account with one inclusive fee and are typically smaller than the SIA Managed Accounts. Strategic Investment Advisors is the sponsor and manager of the wrap accounts. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We use an Investor Questionnaire to help determine a suitable model for the customer. Once the customer decides on the desired model, we have the customer sign an investment policy statement and a advisory agreement. As appropriate, we may also review and discuss a client's prior investment history, as well as family composition, resources and background.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the models stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as the customer's tax considerations.

Clients may not impose restrictions on these accounts.

We offer a wrap fee brochure to our wrap account clients. A wrap program participant should consider all of the information within the wrap fee brochure before participating in the wrap fee program.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange traded funds (ETFs)
- Mutual fund shares

Because some types of investments involve certain additional degrees of risk, they will only be implemented when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Our firm provides portfolio management services to clients using the following model asset allocation portfolios. Each model portfolio is designed to meet a particular investment goal. Through personal discussions with the client in which the client's goals and objectives are established, we initially determine whether the model portfolio is suitable to the client's circumstances. Once we confirm suitability, the portfolio is managed based on the portfolio's goal, rather than on each client's individual needs. Clients retain individual ownership of all securities.

Our firm provides portfolio management services to clients using the following model asset

allocation portfolios.

**Conservative Portfolio** - Designed for the cautious investor, one with a low risk tolerance and/or short time horizon. It is targeted toward the investor seeking investment stability and liquidity from the investable assets. The main objective of a person in the conservative range is to preserve capital while providing income.

**Moderate Conservative Portfolio** - Designed for the investor who seeks both modest capital appreciation and income from the portfolio. The investor will have either a moderate time horizon and/or a higher risk tolerance than the conservative investor.

**Moderate Portfolio** - Designed for the investor who seeks relatively stable growth from the investable assets offset by a low level of income. An investor in the moderate risk range will have a higher tolerance for risk and/or a longer time horizon than any of the investors in the more conservative portfolios.

**Moderate Aggressive Portfolio** - Designed for the investor with a relatively high tolerance for risk and a longer time horizon. This investor has little need for current income and seeks above-average growth from the investable assets. The main objective of this risk range is capital appreciation.

**Aggressive Portfolio** - Designed for the investor who has both a high tolerance for risk and a long investment time horizon. The main objective of the aggressive risk range is to provide high growth for the investor's assets without providing current income.

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client's financial circumstances, we will:

1. Attempt to meet annually with each AAA managed client and request any updated information regarding changes in the client's financial situation and investment objectives. If a meeting cannot be arranged, we will send the client the review by certified mail.
2. In the annual meeting, we review the client's portfolio including the portfolio performance, the investments, the target asset allocations, and the current risk of the portfolio. We also discuss whether the client is comfortable with the risk of the portfolio and whether the client wishes to make any changes to withdrawals or contributions.
3. Be reasonably available to consult with the client.
4. Maintain client suitability information in each client's file.
5. Rebalance the account quarterly if an asset class is in variance by 5% or more from the target allocation.

## **RETIREMENT PLAN CONSULTING SERVICES**

We also provide consulting services through Strategic Retirement Solutions, our retirement plan area, to various types of retirement plans, including, but not limited to profit sharing plans and 401(k) (or 403(b)) plans. We offer these services mainly to corporations or other business entities.

**Investment Policy Statement Preparation (hereinafter referred to as "IPS"):**

We will meet with the trustees to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

### **Selection of Investment Vehicles:**

We recommend to the plan trustees a range of appropriate asset allocation models. We then recommend various mutual funds (both index and managed) to populate the models and to offer to the participants as individual investments. The plan trustees adopt our recommended models and investments.

### **Monitoring of Investment Performance:**

We monitor the models and investments quarterly, based on the procedures and timing intervals delineated in the Investment Policy Statement. Although our firm is not involved in any way in the purchase or sale of these investments, we supervise the plan's models and investment options and will make recommendations to the client as market factors and the client's needs dictate.

### **Employee Communications:**

For retirement, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we may also provide quarterly enrollment support for the plan participants. The nature of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section 404(c). The enrollment support will NOT provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

## **MANAGEMENT OF POOLED INVESTMENT VEHICLES**

Strategic Investment Advisors is the manager of Uwharrie Loan Pool I LLC (the Pool) that is offered as a privately placed securities offering that is exempt from registration under the Securities Act of 1933 and the Investment Company Act of 1940. SIA has the primary responsibility for investment management and administrative matters, such as managing which loans are accepted into the Pool. Strategic Investment Advisors and our officers and employees will devote to the Fund as much time as we deem necessary and appropriate to manage the Pool's business. Strategic Investment Advisors and our affiliates are not restricted from forming additional investment funds or pools, entering into other investment advisory relationships or engaging in other business activities, even though such activities may be in competition with the Pool and/or may involve substantial time and resources of our firm and our affiliates. Potentially, such activities could be viewed as creating a conflict of interest in that the time and effort of our management personnel and employees will not be devoted exclusively to the business of the Pool, but could be allocated between the business of the Pool and other of our business activities and those of our affiliates. Investments in the Pool may be recommended to advisory clients for whom a partnership investment may be more suitable than would a separate advisory account managed by our firm. Clients who invest in the Pool are not charged any additional advisory fees. Strategic Investment Advisors

manages the Pool on a discretionary basis in accordance with the terms and conditions of the Pool's offering and organizational documents.

### **CONSULTING SERVICES**

Clients can also receive investment advice on a more focused basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We also provide specific consultation and administrative services regarding investment and financial concerns of the client.

Consulting recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

### **AMOUNT OF MANAGED ASSETS**

As of 12/31/2012, we were actively managing \$130,952,479 of clients' assets on a discretionary basis.

## **Item 5 Fees and Compensation**

### **INVESTMENT SUPERVISORY SERVICES MODEL PORTFOLIO MANAGEMENT FEES**

#### **SIA Managed Accounts**

The annualized fee for Investment Supervisory Services will be charged as a percentage of assets under management, according to the following schedule:

<b><u>Assets Under Management</u></b>	<b><u>Annual Fee</u></b>
<b>First \$500,000</b>	<b>1.50%</b>
<b>Next \$500,000</b>	<b>1.25%</b>
<b>Next \$1,000,000</b>	<b>1.00%</b>
<b>Next \$2,000,000</b>	<b>.75%</b>

**This schedule is used as a guideline only.**

Our fees are billed monthly, in arrears, based upon the market value of the client's account at the end of the previous billing period. Fees will be debited from the account in accordance with the client authorization in the Client Services Agreement, Schedule C.

A minimum of **\$250,000** of assets under management is required for this service. This account size may be negotiable under certain circumstances. Strategic Investment Advisors may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

**Limited Negotiability of Advisory Fees:** Although Strategic Investment Advisors has established the aforementioned fee schedule, we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs will be considered in determining the fee schedule. These include the complexity of the client situation, assets to be placed under management, anticipated future additional assets; related accounts, and

other factors. The specific annual fee schedule will be identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee. SIA may have some clients who have accounts held at more than one custodian. With the client's approval on Schedule C of the Client Services Agreement, SIA may debit the management fee due from all of the accounts that comprise the portfolio from a single account held at one of the custodians or debit an account for outside assets not held at a custodian.

Discounts, not generally available to our advisory clients, may be offered to clients who have a sizeable relationship with one of our affiliate banks.

### **Asset Allocation Avenue Accounts**

The annualized fee for Model Portfolio Management Services will be charged as a percentage of assets under management, according to the following schedule:

<b><u>Assets Under Management</u></b>	<b><u>Annual Fee</u></b>
<b>All account values</b>	<b>1.80%</b>

Our fees are billed quarterly, in advance, based upon the market value of the client's account at the end of the previous billing period. Fees will be debited from the account by the custodian in accordance with the client authorization in the Client Services Agreement.

A minimum of **\$50,000** of assets under management is required for this service. This account size may be negotiable under certain circumstances.

Asset Allocation Avenue Account advisory fees are not negotiable.

### **RETIREMENT PLAN CONSULTING FEES**

Our fees for Pension Consulting Services are based on a percentage of assets under advisement, according to the following schedule:

<b><u>Assets Under Management</u></b>	<b><u>Annual Fee</u></b>
<b>Any</b>	<b>.30% to 1.75%</b>

This schedule is used as a guideline only; all fees are subject to negotiation at the sole discretion of SIA. Specific fee amounts will be indicated in the Client Services Agreement between SIA and the plan or plan sponsor.

Plan sponsors are invoiced in arrears at the end of each calendar quarter by the record keeper.

### **CONSULTING SERVICES FEES**

Strategic Investment Advisors' Consulting Services fee will be determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

## MANAGEMENT OF POOLED INVESTMENT VEHICLES

Strategic Investment Advisors provides services to certain pooled investment vehicles. SIA is compensated a management fee each month equal to 1% per annum of the total capital contributions which the Class B Members have made to the investment vehicle. If SIA's management fee would cause the investment vehicle to experience a flat or negative cash flow situation, the fee could be reduced in an effort to allow the investment vehicle to maintain a positive cash flow.

## GENERAL INFORMATION

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason upon receipt of five days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

***Mutual Fund Fees:*** All fees paid to Strategic Investment Advisors for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee or early redemption fee. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

***Wrap Fee Programs:*** The Asset Avenue Allocation Account is a wrap fee program. In a wrap fee arrangement, clients pay a single fee for advisory, brokerage and custodial services. Client's portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be charged to clients.

***Additional Fees and Expenses:*** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

***Grandfathering of Minimum Account Requirements:*** Pre-existing advisory clients are subject to Strategic Investment Advisors' minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

**ERISA Accounts:** Strategic Investment Advisors is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Strategic Investment Advisors may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees. Conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees may be received only when such fees are used to offset Strategic Investment Advisors' advisory fees. SIA ensures oversight of third party services providers with regard to current disclosure requirements.

**Advisory Fees in General:** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees. No increase in SIA's fee(s) shall be effective without a 30-day written notification to the client.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.

## **Item 6 Performance-Based Fees and Side-By-Side Management**

Strategic Investment Advisors does not charge performance-based fees.

## **Item 7 Types of Clients**

Strategic Investment Advisors provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Retirement and profit sharing plans (other than plan participants)
- Charitable organizations
- Other pooled investment vehicles (e.g., hedge funds, loan pool)
- Corporations or other businesses not listed above
- Other

SIA provides investment advisory services to a pooled investment vehicle, Uwharrie Loan Pool I LLC (the Pool) as referenced in under Item 4. The Pool is structured as a direct participation program and is offered as a privately placed securities offering that is exempt from registration under the Securities Act of 1933 and/or the Investment Company Act of 1940.

As previously disclosed in Item 5, our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed

understanding of those requirements, please review the disclosures provided in each applicable service.

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

### **METHODS OF ANALYSIS**

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

***Asset Allocation:*** Rather than focusing primarily on individual securities selection, we attempt to determine an appropriate mix of asset classes including, but not limited to, various U.S. and international equities, U.S. and international fixed income products, commodities, alternatives and cash equivalents.

A risk of asset allocation is that the mix of asset classes may change over time due to market movement, and if not corrected, will no longer be appropriate given the client's objectives.

***Mutual Fund and/or ETF Analysis:*** We analyze the historical performance of the mutual fund or ETF using various statistics to determine if the fund manager has historically added value above a suitable benchmark over a period greater than three years and across various market conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if the manager is continuing to follow his/her stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

***Quantitative Analysis:*** We use various statistical estimates as we attempt to select funds that outperform a predefined benchmark more frequently than funds with similar objectives and characteristics. It is important to note that the term outperform applies to both increasing and decreasing markets. All comparisons are performed over a time horizon of 3 years or more provided the data is available. All decisions to include or exclude funds in our model portfolios are made by the investment committee.

A risk in using quantitative analysis is that the statistics used may rely on assumptions that prove to be incorrect and/or misunderstood.

***Qualitative Analysis:*** We subjectively evaluate non-quantifiable factors such as a manager's tenure to gain a better understanding of a funds behavior. Other factors include management structure, purchase restrictions and market perception.

A risk is using qualitative analysis is that the internal bias of the investment committee may negatively effect what may be a suitable investment for a client's portfolio..

**Technical Analysis:** We analyze past market movements in an attempt to forecast long-term market outcomes. Our forecasts are comprised of both internal and external calculations.

Technical analysis is based on statistical data and is therefore subject to estimation error which could lead to unanticipated outcomes in the future which could negatively affect a client's portfolio.

**Cyclical Analysis:** Occasionally we may take into account the current market's place in a larger market cycle when making decisions regarding trading or model structure/development.

A risk of cyclical analysis is that we could make a decision based on historical cycles and may place the current market in the wrong area of the current cycle.

**Fundamental Analysis:** From time to time, we may take into account the current value of a security as well as the financial condition of a particular company. This fundamental analysis will allow us to determine potential asset performance when statistical data may not be available. This type of analysis also allows us to spot potential risk not noticed through quantitative data.

Fundamental analysis does not attempt to anticipate market movements. The risk of fundamental analysis is that the timing of our decision may be inaccurate, subject to internal bias, or prove to be unreliable information.

**Risks for all forms of analysis:** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## **INVESTMENT STRATEGIES**

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

**Long-term purchases:** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

**Short-term purchases:** When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to make a portfolio more tax efficient.

A short-term purchase strategy poses risks should the security, that was designed to be a short-term purchase, remain in the portfolio for a longer time than originally planned resulting in underperformance of the portfolio.

In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

**Risk of Loss:** Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

## **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

SIA does not have any legal or disciplinary events to disclose.

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

### **HOLDING COMPANY AND RELATED COMPANY AFFILIATION**

#### **Uwharrie Capital Corp**

We are a registered investment adviser and a wholly owned subsidiary of **Uwharrie Capital Corp**, a bank financial holding company, that offers a broad spectrum of banking products and financial services to consumers, locally-owned businesses and commercial clients. As a subsidiary of **Uwharrie Capital Corp**, our firm is under common ownership and control with several financial institutions, including the following with which we have a material business relationship (referred to collectively as the "Related Companies").

**Bank of Stanly, Anson Bank and Trust, Cabarrus Bank and Trust**, affiliate banks under the parent holding company, Uwharrie Capital Corp. The affiliate banks act as custodians for the Absolute Return Account funds managed by Strategic Investment Advisors. (See the blended accounts referenced in Item 4.)

#### **The Strategic Alliance Corporation, a FINRA member broker-dealer and subsidiary of Bank of Stanly**

Some management personnel and other employees of Strategic Investment Advisors are separately licensed as registered representatives of The Strategic Alliance Corporation (TSAC). These individuals, in their separate capacity, can effect securities transactions for which they may receive separate, yet customary information. Clients, however, are not under any obligation to engage these individuals when considering the purchase/sale of securities.

#### **Other Related Companies Information**

Where appropriate, Strategic Investment Advisors and our employees may recommend the various investment and investment-related services of the Related Companies to our advisory clients. The Related Companies and their employees may also recommend the advisory

services of our firm to their clients. The services provided by the Related Companies are separate and distinct from our advisory services, and are provided for separate and additional compensation. There may also be arrangements between Strategic Investment Advisors and these Related Companies where Strategic Investment Advisors and/or the Related Companies and their employees receive payment in exchange for client referrals. No Strategic Investment Advisors client is obligated to use the services of any of the Related Companies.

### **Private Client Services, LLC**

Some management personnel and other employees of Strategic Investment Advisors are separately licensed as registered representatives of Private Client Services, LLC (PCS), a registered broker dealer and a member of FINRA or as insurance agents for various insurance companies through Private Client Services, LLC. PCS and SIA are independent entities. These individuals, in their separate capacities as registered representatives and/or as insurance agents, can effect securities transactions and/or purchase insurance and insurance-related investment products for Strategic Investment Advisors' advisory clients for which these individuals will receive separate and additional compensation yet customary compensation for these transactions. Because of the relationship with PCS, PCS may have access to client information such as risk tolerance, investment objectives, time horizon and other customer information. Clients are not under any obligation to engage these individuals when considering the purchase/sale of securities or insurance. The implementation of any or all recommendations is solely at the discretion of the client.

### **POOLED INVESTMENT VEHICLE AFFILIATION**

Management personnel of Strategic Investment Advisors may also be involved in the selling and management of Uwharrie Loan Pool I LLC (the Pool), a pooled investment vehicle. As appropriate, our advisory clients may be introduced to the opportunity to invest in the Pool. These related persons of our firm may receive investment advisory compensation in relation to these investments. Also they do have a conflict of interest in soliciting client investments. Because investment in these types of entities may involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability. Clients interested in investing in the partnership/company should refer to the partnership's/ company's private placement memorandum for more information specific to the partnership/ company.

### **OTHER INFORMATION**

Related persons of our firm may spend as much as 30% of their time on these related activities. While Strategic Investment Advisors and these individuals endeavor at all times to put the interest of the clients first as part of our fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

A list of these affiliated entities is specifically disclosed on Schedule D of Form ADV, Part 1 at Item 7.B. Part 1 of our Form ADV can be accessed by following the directions provided on the Cover Page of this Firm Brochure.

Clients should be aware that the receipt of additional compensation by Strategic Investment

Advisors and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. Strategic Investment Advisors endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Strategic Investment Advisors and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Strategic Investment Advisors' Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not

be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [mobrien@investsia.com](mailto:mobrien@investsia.com) or by calling us at 704-983-5959.

Strategic Investment Advisors and individuals associated with our firm are prohibited from engaging in principal transactions.

Strategic Investment Advisors and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. However, they may not execute their own trades.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm are separately registered as securities representatives of a broker-dealer and/or licensed as an insurance agent/broker of various insurance companies. Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.

Our firm requires prior approval for any IPO or private placement investments.

## Item 12 Brokerage Practices

**Trade Aggregation:** Strategic Investment Advisors will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block.

Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. Strategic Investment Advisors will typically aggregate trades among clients whose accounts can be traded at a given broker, and generally will rotate or vary the order of brokers through which it places trades for clients on any particular day. Strategic Investment Advisors' block trading policy and procedures are as follows:

- 1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with Strategic Investment Advisors, or our firm's order allocation policy.
- 2) The portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
- 3) The portfolio manager must reasonably believe that the order aggregation will benefit, and will enable Strategic Investment Advisors to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a "20-20 hindsight" perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.
- 4) Prior to entry of an aggregated order, a written order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
- 5) If the order 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 pro rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.
- 6) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order, and must share in the commissions on a pro rata basis in proportion to the client's participation. Under the client's agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client.
- 7) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.

8) Strategic Investment Advisors' client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for, that account.

9) Funds and securities for aggregated orders are clearly identified on Strategic Investment Advisors' records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.

10) No client or account will be favored over another.

**Directed Brokerage:** Strategic Investment Advisors may recommend that SIA Managed Account clients and Asset Allocation Avenue Wrap Account ("AAA") clients establish brokerage accounts with the Pershing Advisor Solutions LLC ("PAS"), an affiliate of Pershing LLC ("Pershing"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. PAS and Pershing are subsidiaries of the Bank of New York Mellon Company, Inc. Although we recommend that clients establish accounts at PAS and Pershing, it is the client's decision to custody assets with PAS and Pershing. Strategic Investment Advisors is independently owned and operated and not affiliated with PAS or Pershing. Because SIA only uses one custodial platform, a customer's request to use another custodian could result in the customer not being able to open an account with SIA.

Strategic Investment Advisors is in the process of transferring all SIA Managed Accounts from Schwab Institutional to Pershing. However, some accounts still are in custody at Schwab Institutional, a division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC. Schwab continues to effect trades for their accounts. Although we recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Strategic Investment Advisors is independently owned and operated and not affiliated with Schwab.

The client may direct SIA to use a particular broker-dealer (subject to SIA's right to decline and/or terminate the engagement) to execute some or all transactions for the client's account. In such an event, the client will negotiate terms and arrangements for the account with that broker-dealer, and SIA will not seek better execution services or prices from the other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by SIA. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

For retirement plans offered through Strategic Retirement Solutions, Strategic Investment Advisors may recommend that plan trustees sign a custody agreement with either MG Trust Company, LLC or Charles Schwab Trust Company. The custody recommendation will be based on the asset size of the plan and the number of participants. The plan trustees make the decision of where to custody the assets and sign a separate agreement with the custodian.

PAS/Pershing and Schwab provide Strategic Investment Advisors with access to the institutional trading and custody services, which are typically not available to Pershing or Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million

of the adviser's clients' assets are maintained in accounts at Pershing or Schwab. These services are not contingent upon our firm committing to Pershing or Schwab any specific amount of business (assets in custody or trading commissions). PAS/Pershing's and Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

PAS/Pershing provides Strategic Investment Advisors AAA accounts with access to the Pershing PEAK platform that is not available to retail investors. PAS/Pershing receives a percentage of the fee charged to the customer based on the assets under management. Services provided by PAS/Pershing include the execution of securities transactions, custody, research, and access to mutual funds. Clients are able to buy some no-load funds and funds at net asset value because they are participating in the managed program.

For our client accounts maintained in its custody, Pershing and Schwab generally do not charge separately for custody services but are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Pershing or that settle into Pershing accounts.

Schwab Institutional and PAS/Pershing also makes available to our firm other products and services that benefit Strategic Investment Advisors but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab or PAS/Pershing.

Schwab's and PAS/Pershing's products and services that assist us in managing and administering our clients' accounts include software and other technology that

- i. provide access to client account data (such as trade confirmations and account statements);
- ii. facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- iii. provide research, pricing and other market data;
- iv. facilitate payment of our fees from clients' accounts; and
- v. assists with back-office functions, recordkeeping and client reporting.

Schwab Institutional and PAS/Pershing also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- i. compliance, legal and business consulting;
- ii. publications and conferences on practice management and business succession; and
- iii. access to employee benefits providers, human capital consultants and insurance providers.

Schwab and PAS/Pershing may make available, arrange and/or pay third-party vendors for the types of services rendered to Strategic Investment Advisors. Schwab Institutional and PAS/Pershing may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm.

Schwab Institutional and PAS/Pershing may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, or PAS/Pershing, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab and PAS/Pershing, which may create a potential conflict of interest.

## **Item 13    Review of Accounts**

### **INVESTMENT SUPERVISORY SERVICES**

#### **Model Portfolio Management Services**

##### **SIA Managed Accounts**

**REVIEWS:** While the underlying securities within Individual SIA Managed Accounts are continually monitored, these account statements are reviewed at least quarterly. Accounts are reviewed in more detail semi-annually when the representative meets with the customer. At this time, the client's stated investment objectives and guidelines are discussed as well as any investment restrictions provided by the client. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by:

Jeff Talley - President, Senior Relationship Manager

Lori Misenheimer - EVP, Senior Relationship Manager

Christy Stoner - CEO, Senior Relationship Manager

Brooke Senter - Relationship Manager

David Gaskin - EVP, Senior Relationship Manager

Michael Harwood - Senior Relationship Manager

Robert B. Brannan – EVP, Relationship Manager

Kyle Vann Eudy – Relationship Manager

**REPORTS:** In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer and/or custodian, we provide quarterly reports summarizing account performance, balances and holdings. We strongly urge clients to compare our quarterly reports with those reports provided by the custodians.

##### **Asset Allocation Avenue Accounts**

**REVIEWS:** While the underlying securities within Asset Allocation Avenue Accounts are continually monitored, these accounts are reviewed at least quarterly. A more in depth review is done annually at the customer meeting in the context of the investment objectives and guidelines of each model portfolio. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or

economic environment.

These accounts are reviewed by:

Jeff Talley - President, Senior Relationship Manager

Lori Misenheimer - EVP, Senior Relationship Manager

Brooke Senter- Relationship Manager

David Gaskin - EVP, Senior Relationship Manager

Michael Harwood - Senior Relationship Manager

Robert B. Brannan – Relationship Manager

Kyle Vann Eudy – Relationship Manager

**REPORTS:** In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, the custodian (Pershing LLC) provides quarterly reports summarizing account performance, balances and holdings.

### **STRATEGIC RETIREMENT SOLUTIONS (SRS) CONSULTING SERVICES**

**REVIEWS:** Strategic Investment Advisors will review the client's Investment Policy Statement (IPS) whenever the client advises us of a change in circumstances regarding the needs of the plan. Strategic Investment Advisors will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such reviews will generally occur annually.

These accounts are reviewed by:

Lori Misenheimer - EVP, Senior Relationship Manager

Teresa Lowder - Retirement Plan Administrator

**REPORTS:** Strategic Investment Advisors will provide reports to SRS Consulting Services clients based on the terms set forth in the client's Investment Policy Statement (IPS).

### **CONSULTING SERVICES**

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Consulting Services clients unless otherwise contracted for. Such reviews will be conducted by the client's account representative.

**REPORTS:** Consulting Services clients will not typically receive reports due to the nature of the service.

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

### **CLIENT REFERRALS**

Our firm, in the future, may pay referral fees to affiliated persons ("Solicitors") for introducing clients to us. The Solicitor is only allowed to make impersonal investment advice that

involves directing the client to the firm. As a matter of firm practice, the advisory fees paid to us by clients referred by solicitors are not increased as a result of any referral. Solicitors will be compensated on the basis of a percentage of the first year's management fee. The firm is in compliance with the requirements of the solicitation rule. Currently no solicitor fees are being paid by SIA.

Uwharrie Capital Corp, the parent company of SIA, utilizes a system of referrals where representatives are paid a referral fee for making referrals for a bank product. Non-registered Uwharrie Capital Corp employees also are paid for making referrals for SIA, TSAC or BOS Agency. This fee is nominal.

It is Strategic Investment Advisors' policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Strategic Investment Advisors complies with the Solicitation Rule by requiring a written agreement between the solicitor and the firm when the program is active.

## **Item 15 Custody**

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from the SIA Managed client accounts. The fees for the Asset Allocation Avenue wrap accounts are debited by the custodian.

As part of this billing process, the SIA Managed client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian of the SIA Managed account does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our SIA Managed account clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current. Statements for the Asset Allocation Avenue wrap accounts are sent quarterly by the custodian.

SIA is deemed to have custody of accounts where assets are held at one of our affiliate banks. These banks are Bank of Stanly, Cabarrus Bank and Trust, and Anson Bank and Trust. Each bank sends at least a quarterly statement to the customer. The firm complies with the SEC custody requirements.

## **Item 16 Investment Discretion**

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

As previously disclosed in Item 4 of this brochure, our firm does not provide non-discretionary asset management services for the SIA Managed Accounts or the AAA Accounts. The firm does recommend portfolio models to the trustees of retirement plans under the Strategic Retirement Solutions program; however, the firm does not trade the participant accounts.

## **Item 17 Voting Client Securities**

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

## **Item 18 Financial Information**

Strategic Investment Advisors has no financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Strategic Investment Advisors has not been the subject of a bankruptcy petition at any time during the past ten years.



