

**FORM ADV****Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

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Name of Investment Adviser:

**Shareks, LLC**

Address: (Number and Street)

**234 Mott Street, #18**

(City)

**New York**

(State)

**NY**

(Zip Code)

**10012**

Area Code: Telephone Number:

**( 917) 657-8126**

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.

**FORM ADV****Part II - Page 2**

Applicant:

**Shareks, LLC**

SEC File Number:

801-**68237**

Date:

**August 10, 2007****1. A. Advisory Services and Fees.** (check the applicable boxes)For each type of service provided, state the approximate % of total advisory billings from that service.  
(See instruction below.)**Applicant:**

- |   |   |              |
|---|---|--------------|
| <input checked="" type="checkbox"/> (1) | Provides investment supervisory services . . . . .  | <u>60%</u>   |
| <input type="checkbox"/> (2)            | Manages investment advisory accounts not involving investment supervisory services . . . . .  | <u>    %</u> |
| <input type="checkbox"/> (3)            | Furnishes investment advice through consultations not included in either service described above . . . . .  | <u>    %</u> |
| <input checked="" type="checkbox"/> (4) | Issues periodicals about securities by subscription . . . . .   | <u>40%</u>   |
| <input type="checkbox"/> (5)            | Issues special reports about securities not included in any service described above . . . . .   | <u>    %</u> |
| <input type="checkbox"/> (6)            | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . . | <u>    %</u> |
| <input type="checkbox"/> (7)            | On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .   | <u>    %</u> |
| <input type="checkbox"/> (8)            | Provides a timing service . . . . .   | <u>    %</u> |
| <input type="checkbox"/> (9)            | Furnishes advice about securities in any manner not described above . . . . .   | <u>    %</u> |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

**B.** Does applicant call any of the services it checked above financial planning or some similar term? . . . . .Yes ☐ No ☒**C.** Applicant offers investment advisory services for: (check all that apply)

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input checked="" type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges                                     | <input type="checkbox"/> (5) Commissions                  |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees)       | <input type="checkbox"/> (6) Other                        |

**D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

**2. Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals                      | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations                    |
| <input checked="" type="checkbox"/> B. Banks or thrift institutions     | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input checked="" type="checkbox"/> C. Investment companies             | <input type="checkbox"/> G. Other (describe on Schedule F)   |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans |  |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**FORM ADV****Part II - Page 3**

Applicant:

**Shareks, LLC**

SEC File Number:

801- **68237**

Date:

**August 10, 2007****3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> A. Equity securities                               | <input type="checkbox"/> H. United States government securities     |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                     |   |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter             | <input type="checkbox"/> I. Options contracts on:                   |
| <input checked="" type="checkbox"/> (3) foreign issues                                 | <input type="checkbox"/> (1) securities                             |
|  | <input type="checkbox"/> (2) commodities                            |
| <input type="checkbox"/> B. Warrants   | <input type="checkbox"/> J. Futures contracts on:                   |
| <input type="checkbox"/> C. Corporate debt securities<br>(other than commercial paper) | <input type="checkbox"/> (1) tangibles                              |
|  | <input type="checkbox"/> (2) intangibles                            |
| <input type="checkbox"/> D. Commercial paper   | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> E. Certificates of deposit                                    | <input checked="" type="checkbox"/> (1) real estate                 |
| <input type="checkbox"/> F. Municipal securities                                       | <input checked="" type="checkbox"/> (2) oil and gas interests       |
|  | <input type="checkbox"/> (3) other (explain on Schedule F)          |
| <input type="checkbox"/> G. Investment company securities:                             | <input type="checkbox"/> L. Other (explain on Schedule F)           |
| <input type="checkbox"/> (1) variable life insurance                                   |   |
| <input type="checkbox"/> (2) variable annuities  |   |
| <input checked="" type="checkbox"/> (3) mutual fund shares                             |   |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.****A.** Applicant's security analysis methods include: (check those that apply)

- |   |  |
|---|--|
| (1) <input checked="" type="checkbox"/> Charting    | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |  |

**B.** The main sources of information applicant uses include: (check those that apply)

- |  |  |
|--|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services   |
| (2) <input type="checkbox"/> Inspections of corporate activities           | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the<br>Securities and Exchange Commission |
| (3) <input type="checkbox"/> Research materials prepared by others         | (7) <input checked="" type="checkbox"/> Company press releases   |
| (4) <input type="checkbox"/> Corporate rating services                     | (8) <input type="checkbox"/> Other (explain on Schedule F)   |

**C.** The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |  |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions  |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input type="checkbox"/> Option writing, including covered options, uncovered<br>options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days)                            | (7) <input type="checkbox"/> Other (explain on Schedule F)   |
| (4) <input checked="" type="checkbox"/> Short sales  |  |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**FORM ADV****Part II - Page 4**

Applicant:

**Shareks, LLC**

SEC File Number:

**801-68237**

Date:

**August 10, 2007****5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? . . . . .

Yes No  
☒ ☐

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- |                 |  |
|-----------------|--|
| • name          | • formal education after high school               |
| • year of birth | • business background for the preceding five years |

**7. Other Business Activities.** (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |  |
|--|--|
| <input type="checkbox"/> (1) broker-dealer   | <input type="checkbox"/> (7) accounting firm                                       |
| <input type="checkbox"/> (2) investment company  | <input type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser  | <input type="checkbox"/> (9) insurance company or agency                           |
| <input type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.....

Yes No  
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**FORM ADV****Part II - Page 5**

Applicant:

**Shareks, LLC**

SEC File Number:

801- **68237**

Date:

**August 10, 2007****9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? . . . . .

Yes No  
☒ ☐

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

**See Schedule F.**

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

**See Schedule F.****Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

Applicant:

Shareks, LLC

SEC File Number:

801-68237

Date:

August 10, 2007

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold? . . . . .

Yes No

☒ ☐

(2) amount of the securities to be bought or sold ? . . . . .

Yes No

☒ ☐

(3) broker or dealer to be used ? . . . . .

Yes No

☐ ☒

(4) commission rates paid? . . . . .

Yes No

☐ ☒

B. Does applicant or a related person suggest brokers to clients? . . . . .

Yes No

☒ ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? . . . . .

Yes No

☐ ☒

B. directly or indirectly compensates any person for client referrals? . . . . .

Yes No

☐ ☒

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities unless applicant is registered or registering only with the Securities and Exchange Commission; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? . . . . .

Yes No

☐ ☒

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:

**Shareks, LLC**

SEC File Number:

801- 68237

Date:

**August 10, 2007**

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

**Shareks, LLC**

IRS Empl. Ident.No.:

20-5970699

Item of Form  
(identify)

Answer

Part II, Page 2, Item 1.D.

Shareks, LLC (hereinafter referred to as "Advisor") offers personalized investment advisory services to clients. Advisor's services and fee arrangements are described in the following pages.

Advisor is a limited liability company formed under the laws of the State of Tennessee and domiciled in New York. This Schedule F narrative provides clients with information regarding Advisor and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory client of the advisor.

Additional information about Advisor is available through the U.S. Securities and Exchange Commission's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Clients can search this site by using Advisor's name or by an identification number known as a CRD number. The CRD number for Advisor is 144822.

**Investment Management Services.** Advisor sponsors the Shareks, LLC Wrap-Fee Program, an investment advisory wrap-fee program ("Program"). Only investment advisor representatives of the Advisor may serve as portfolio managers in the Program. Therefore, participants in the Program must be advisory clients of Advisor.

Through the Program, Advisor provides investment supervisory and management services defined as providing continuous investment advice based on each client's individual needs. Upon execution of an *Agreement for Investment Management Services*, Advisor shall assist clients with the establishment of an individual account ("Account") for the client at broker-dealer recommended by Advisor. The broker-dealer will serve as the qualified custodian for Accounts through the Program. Clients must appoint the Advisor as their investment advisor on the Account. Advisor shall be granted trading authorization over each client's individual Account in order to implement Advisor's continuous investment advice. Implementation services are provided on a discretionary basis.

Advisor has developed four proprietary portfolios used to manage client assets through the Program. Based upon information provided by clients, Advisor will generally use one or more of the portfolios to manage client assets. Portfolios are selected for a client based on the client's individual needs and circumstances. The four portfolios include:

David Sharek's Growth Stock Portfolio: This growth portfolio is typically comprised of 50 individual Large Cap Growth, Mid Cap Growth, and Small Cap Growth equity securities. Characteristics of individual equities comprising this portfolio include high-profit growth, earnings capacity, earnings consistency, and growth opportunity.

David Sharek's Aggressive Growth Portfolio: The Aggressive Growth Portfolio is comprised of approximately 10 to 20 stocks in the Growth Portfolio that Advisor believes have the ability to outperform the overall market during the next 6-12 month period. Although equity positions within this portfolio may not be speculative, the small number of equity securities held within the portfolio and their concentrated positions make this portfolio more volatile and riskier than the Growth Portfolio.

David Sharek's Core Stock Portfolio: The Core Portfolio is comprised of equity securities with strong historical earnings consistency. Equity securities selected must generally have a 5-10 year historical record of earnings growth. The Core Portfolio implements a long-term strategy as compared to the Growth Portfolio and Aggressive Growth Portfolio.

**Complete amended pages in full, circle amended items and file with execution page (page 1).**

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:

**Shareks, LLC**

SEC File Number:

**801- 68237**

Date:

**August 10, 2007**

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

**Shareks, LLC**

IRS Empl. Ident.No.:

**20-5970699**

Item of Form  
(identify)

Answer

Part II, Page 2, Item 1.D.  
(continued)

**David Sharek's Income Stock Portfolio:** The Income Portfolio is built to provide stable income and portfolio growth to combat inflation. The portfolio is comprised of equity securities with strong yields, typically 3-5%, and are projected by Advisor to have the ability to grow future earnings every year. Equity securities within the portfolio are typically more conservative than those in the Growth Portfolio and Aggressive Growth Portfolio. Predominant sectors and industries represented in the Income Portfolio include large national banks, regional banks, real estate investment trusts (REITs), limited partnerships, and income producing energy investments.

Clients in the Program pay a single annualized fee, based upon a percentage of the market value of all Program assets, for participation in the Program. The maximum fee charged for the Program shall not exceed 3.00% annually. The annual fee will be divided and billed quarterly in advance based on the market value of the assets at the end of the previous quarter. The Program may cost clients more or less than purchasing such services separately. Further, services provided by Advisor may be more expensive than services provided by other financial firms. The Program fee includes the Advisor's management fee and all trade execution fees charged by the broker-dealer. Specifically, the fee will cover all commissions, prime broker fees, and any other transaction fees relating to the execution of securities transactions within client accounts.

The initial fee for new accounts is pro-rated based on the number of days remaining in the initial quarter. Fees are deducted directly from the client's Account. Clients must provide the custodian with written authorization to have fees deducted from the Account and paid to Advisor. The broker-dealer will send client statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee deducted directly from the Account.

The actual fee charged to individual clients is based on factors such as, but not necessarily limited to, the amount of assets under management and the portfolio(s) used to manage the client's assets. The specific fee charged to a client will be agreed upon and described in the client agreement prior to commencing services.

Clients may also incur certain charges imposed by third parties other than Advisor in connection with investments made through the account, including but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, and IRA and qualified retirement plan fees. Management and transaction fees charged by Advisor are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to clients. A description of these fees and expenses are available in each investment company security's prospectus.

Advisor or client may terminate the agreement for services by providing notice to the other party. In the event a client terminates services, termination will be effective upon Advisor's receipt of notification. Advisor may terminate services by providing client with 30 days written notice. If services are terminated within five (5) business days of executing the agreement, services will be terminated without penalty and full refund of any pre-paid fees will be provided to the client. If services are terminated after the initial five day period, the client will receive a pro-rated refund based on the number of days services are provided in the final quarter.

A complete description of the Program is provided in the Program's Schedule H disclosure brochure. All clients contracting for the Program will receive a copy of the Schedule H disclosure brochure prior to or upon entering into an agreement for the Program services. Program clients will also be offered a copy of the Schedule H disclosure brochure at least annually.

**Complete amended pages in full, circle amended items and file with execution page (page 1).**



**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Shareks, LLC	801- 68237	August 10, 2007

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Shareks, LLC</b>		IRS Empl. Ident.No.: 20-5970699
Item of Form (identify)	Answer	
Part II, Page 2, Item 1.D. (continued)	<p><b>Online Subscription Service.</b> Advisor offers online subscriptions to investors who wish to view Advisor's proprietary stock research, via <a href="http://www.davidsharek.com">www.davidsharek.com</a>. Subscription rates are \$20 per month or \$200 per year to view charts, earnings tables, and comments on stocks within the Growth Portfolio. Fees are charged in advance, via credit card. Subscribers can view and download David Sharek's Growth Stock Newsletter on the site. The newsletter lists the equity securities within the portfolio, the previous month's additions and deletions, highlights of certain securities, and general market commentary.</p> <p>New additions and deletions from the Growth Portfolio are posted online at least five minutes in advance of execution of these trades, to eliminate front running. Due to time constraints, an entire page explaining Advisor's reasoning for purchasing an individual equity security may not be available until after close of market trading.</p> <p>Advisor does not guarantee the accurateness of the data contained on Advisor's website, since most research is compiled by hand, and human error will inevitably occur.</p> <p>Subscribers are not obligated in any manner to implement the recommendations of Advisor. The process of selecting equity securities does not consider an individual subscriber's financial objectives or suitability. Further, Advisor will not be aware of or consider the subscriber's individual financial condition, investment horizon, or risk tolerance. Therefore, recommendations made by Advisor in the Growth Portfolio may not be suitable for all subscribers.</p> <p>Advisor does not provide any implementation services under this program. Should a subscriber choose to implement recommendations provided through this service, Advisor recommends the subscriber work closely with his/her attorney, accountant, insurance agent, broker and/or other investment advisor. In the event a subscriber would like Advisor to implement recommendations on the subscriber's behalf, the subscriber must contract for Advisor's Investment Management Services previously described in this document.</p> <p>Subscribers may cancel their online subscription at any point in time by providing notice to Advisor.</p>	
Part II, Page 4, Item 5	<p><b>Education and Business Standards.</b> Associated persons of Advisor that provide investment advice must possess a college degree and/or appropriate business experience and all required licenses.</p>	
Part II, Page 4, Item 6	<p><b>Education and Business Background.</b></p> <p><b>David Sharek.</b> Born 1970. Managing Member and Investment Advisor Representative.</p> <p><i>Education Background.</i> State University of New York – Buffalo, Bachelor of Business Administration</p> <p><i>Business Background.</i> Shareks, LLC: Managing Member, January 2007 – Present, Investment Advisor Representative, August 2007 – Present. Wunderlich Securities: Senior Vice President - Investments, November 2002 – August 2007. A.G. Edwards &amp; Sons: Financial Consultant, February 1999 – November 2002.</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Shareks, LLC</b>	801- 68237	<b>August 10, 2007</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Shareks, LLC</b>		IRS Empl. Ident.No.: 20-5970699
Item of Form (identify)	Answer	
Part II, Page 5, Item 9.E.	<b>Participation or Interest in Client Transactions.</b> Advisor and its associated persons may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, Advisor and its associated persons will place client interests ahead of their own interests at all times.	
Part II, Page 5, Item 9.	<b>Code of Ethics.</b> Advisor has established a Code of Ethics that will apply to all of its supervised persons. An investment adviser is considered a fiduciary. 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. Advisor has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for the advisor's Code of Ethics which also covers its Insider Trading and Personal Securities Transactions Policies and Procedures. Advisor requires all of its supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand and agree to comply with the advisor's Code of Ethics. Advisor has the responsibility to make sure that the interests of all clients are placed ahead of Advisor or its supervised person's own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted. Advisor and its supervised persons 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 Advisor's Code of Ethics. However, if a client or a potential client wishes to review Advisor's Code of Ethics in its entirety, a copy will be provided promptly upon request.	
Part II, Page 5, Item 10	<b>Conditions for Managing Accounts.</b> Advisor requires a minimum investment amount of \$50,000 for its management services through the Program. Exceptions to this minimum may be granted at the discretion of Advisor.  <b>Review of Accounts.</b>	
Part II Page 5, Item 11.A.	Client accounts are reviewed at least quarterly. The calendar is the main triggering factor, although more frequent reviews may also be triggered by changes in the client's circumstances, client request, or changes within the market. Portfolios used to manage client accounts and holdings within those portfolios are reviewed on a more frequent basis. Portfolios are usually reviewed as frequently as daily, but no less than monthly. Triggering factors for changes to underlying portfolios include the security's deviation from the portfolio objectives and valuation/performance changes of a security.  David Sharek, Owner and Advisor Representative, is in charge of reviewing all accounts.	
Part II, Page 5, Item 11.B.	Clients will receive account statements at least quarterly from the account custodian. In addition, clients will receive quarterly performance reports from Advisor. When client assets are managed according to the Growth Portfolio, clients will receive David Sharek's Growth Stock Newsletter once per month. The newsletter is delivered via e-mail and lists the equity securities within the portfolio, the previous month's additions and deletions, highlights of certain securities, and general market commentary.	

**Complete amended pages in full, circle amended items and file with execution page (page 1).**

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Shareks, LLC	801- 68237	August 10, 2007

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Shareks, LLC</b>		IRS Empl. Ident.No.: 20-5970699
Item of Form (identify)	Answer	
Part II, Page 6, Item 12.A. (1) & (2)	<p><b>Investment or Brokerage Discretion</b></p> <p><b>Discretionary Authority.</b> Upon receiving written authorization from the client, Advisor provides discretionary investment management services over client accounts. When discretionary authority is granted, Advisor will have the authority to determine the type of securities and the amount of securities that can be bought or sold for the client portfolio without obtaining the client's consent for each transaction.</p> <p><b>Proxy-Voting Policy.</b> Advisor does not vote proxies on behalf of clients. However, if a client has a question regarding proxy-voting material, Advisor may provide advice or clarification regarding the material based on Advisor's understanding of the proxy-voting material presented. Clients will have the final responsibility for determining how proxies are voted.</p>	
Part II, Page 6, Item 12.B.	<p><b>Recommendation of Broker/Dealers.</b> For clients establishing a managed account, a broker-dealer recommended by Advisor will be used as the qualified custodian. At least annually, Advisor will review alternative custodians in the marketplace for comparison to the currently used custodian, evaluating criteria such as overall expertise, cost competitiveness and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations. No single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian. The recommendation of a broker-dealer is not influenced by any soft dollar services or benefits provide to the advisor.</p> <p>Transactions implemented by Advisor for client accounts are generally effected independently, unless Advisor decides to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by Advisor when Advisor believes such action may prove advantageous to clients. When Advisor aggregates client orders, the allocation of securities among client accounts will be done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among Advisor's clients in proportion to the purchase and sale orders placed for each client account on any given day. When Advisor determines to aggregate client orders for the purchase or sale of securities, including securities in which the associated persons of Advisor may invest, Advisor will do so in accordance with the parameters set forth in the SEC No-Action Letter, <i>SMC Capital, Inc.</i> It should be noted, Advisor does not receive any additional compensation or remuneration as a result of aggregation.</p>	
Customer Privacy Notice	<p><b>Customer Privacy Notice</b></p> <p><b>Commitment to Your Private Information:</b> Advisor has a long standing policy of protecting the confidentiality and security information we collect about our clients. We do not, and will not, share nonpublic personal information about you ("Information") with outside third parties without your consent, except for the specific purposes described below. This notice has been provided to you to describe the Information we may gather and the situations under which we may need to share it.</p> <p><b>Why We Collect and How We Use Information.</b> We limit the collection and use of Information within our firm to only those individuals associated or employed with us that must have Information to provide financial services to you. Such services include maintaining your accounts, processing</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Shareks, LLC</b>	801- 68237	<b>August 10, 2007</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Shareks, LLC</b>		IRS Empl. Ident.No.: 20-5970699
Item of Form (identify)	Answer	
	<p>transaction requests, providing financial planning, financial consultation, and other services described in our Form ADV.</p> <p><b>How We Gather Information.</b> We get most Information directly from you when you provide us with information from any of the following sources:</p> <ul style="list-style-type: none"> <li>• Applications or forms (for example: name, address, social security number, birth date, assets, income, financial history)</li> <li>• Transactional activity in your account (for example: trading history and account balances)</li> <li>• Information services and consumer reporting sources (for example: to verify your identity or to assess your credit history)</li> <li>• Other sources with your consent (for example: your insurance professional, attorney, or accountant)</li> </ul> <p><b>How We Protect Information.</b> Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with our stated policies. They may access Information only when there is an acceptable reason to do so, such as to service your account or provide you with financial services. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us. We also maintain physical, electronic, and procedural safeguards to protect information, which comply with applicable SEC, state, and federal laws.</p> <p><b>Sharing Information with Other Companies Permitted Under Law.</b> We do not disclose Information obtained in the course of our practice except as required or permitted under law. Permitted disclosures include, for instance, providing information to unrelated third parties who need to know such Information in order to assist use with the providing services to you. Unrelated third parties may include broker/dealers, mutual fund companies, insurance companies, and the custodian with which your assets are held. In such situations, we stress the confidential nature of information being shared.</p> <p><b>Former Customers.</b> Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).