

## **SunGard Financial Strategies LLC**

**2100 Enterprise Avenue**

**Geneva, IL 60134**

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This brochure provides information about the qualifications and business practices of SunGard Financial Strategies LLC ("SunGard"). If you have any questions about the contents of this brochure, please contact us at (630) 482-7100. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority.

SunGard is registered as an investment adviser with the SEC pursuant to the Investment Advisers Act of 1940, as amended. Recipients of this Brochure should be aware that registration with the SEC does not in any way constitute an endorsement by the SEC of an investment adviser's skill or expertise. Further, registration does not imply or guarantee that a registered adviser has achieved a certain level of skill, competency, sophistication, expertise or training in providing advisory services to its clients.

Additional information about SunGard (IARD/CRD #173244) is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The information provided in Part 2 of Form ADV is intended to assist you in making an informed decision regarding whether or not you want to engage our services.

SunGard believes that communication and transparency are the foundation of our relationship and continually strives to provide you with complete and accurate information at all times. We encourage all current and prospective investors to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

## **Item 2 Material Changes**

Since the date of the last Brochure Supplement, SunGard has updated Item 11, Code of Ethics, Participation or Interest in Client Transactions and Personal Trading, to properly reflect that the provision regarding personal securities transactions is applicable to access persons.

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required under the Investment Advisers Act of 1940, as amended (the “Advisers Act”) or the rules adopted by the SEC. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each “Client” annually and if a material change occurs in the business practices of SunGard. Definitions of each of these terms are outlined in Item 4 below.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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#### **Item 4      Advisory Business**

##### *SunGard Financial Strategies LLC*

SunGard Financial Strategies LLC ("SunGard"), a Delaware limited liability company, was formed in September 2014. SunGard maintains its principal office at 2100 Enterprise Avenue, Geneva, Illinois, 60134. SunGard is a wholly owned subsidiary of SunGard Investment Ventures LLC, which is wholly owned by SunGard Data Systems Inc. ("SDS"). SDS is a privately held SEC filing entity which is a wholly owned subsidiary of SunGard Holdco LLC, which is wholly owned by SunGard Holding Corp., which is wholly owned by SunGard Capital Corp. II ("SCCII"). SCCII is a subsidiary of SunGard Capital Corp. ("SCC"). As an SEC filer, beneficial ownership of the equity securities of SCC and SCCII is identified within the most recent SDS annual report within the SEC's EDGAR Database.

SunGard does not provide advisory services to any parties (hereinafter, "Client(s)"), SunGard's primary business is to solicit institutional clients (hereinafter referred to as "Referred Client(s)") on behalf of other Registered Investment Adviser firms (hereinafter, "Third Party RIAs") that offer investment management and/or financial planning services. SunGard may introduce Referred Clients to one or more Third Party RIAs.

SunGard does not provide investment advice directly or indirectly to Clients or Referred Clients, nor does it provide investment management services, financial planning or similar services. SunGard's services consist solely of referring prospective Referred Clients to Third Party RIAs pursuant to the terms of the written agreement between SunGard and the applicable Third Party RIAs. SunGard is not authorized to act in any way on behalf of any Client or Referred Client.

SunGard does not provide advisory services to individuals or participate in any separate account wrap fee programs. SunGard does not manage any assets, custody any assets of Clients or Referred Clients or handle any account opening or trading functions.

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

In return for SunGard's services, the Third Party RIAs will compensate SunGard with a cash referral fee based upon terms agreed to within the applicable solicitation agreement.

The cash referral fee will be on an account by account basis based on (a) a flat rate percentage, up to 23%, of total revenue earned by the Third Party RIA in connection with the Referred Client; (b) a flat rate percentage, up to 50%, of the investment advisory fees actually received by the Third Party RIA from each Referred Client; or (c) two basis points (0.2%) per year of the market value of any Referred Client's account(s) for which the Third Party RIA provides its advisory services pursuant to an investment management agreement. Cash referral fees are paid in accordance with agreed upon terms within each solicitation agreement.

All fees are invoiced directly to the Third Party RIAs. Generally, fees to SunGard are paid in the following manner: (a) for referral fees based on a flat rate percentage of total revenue earned by the Third Party RIA in connection with the Referred Client, no later than 30 days after the Third Party RIA invoices the applicable Referred Client; (b) for referral fees based on a flat rate percentage of the investment advisory fees received by the Third Party RIA in connection with the Referred Client, quarterly in arrears, based on the investment advisory fees paid and unpaid

by any Referred Client to the Third Party RIA during such quarter; or (c) for referral fees based on basis points of the market value of a Referred Client account(s) serviced by the Third Party RIA, quarterly in arrears, based on the Third Party RIA's books and records.

SunGard's supervised persons that are registered representatives or approved persons of one of SunGard's affiliated broker-dealers may have the potential to receive both a referral fee as well as compensation from the sale of a security or other investment product or service in the form of a brokerage commission as it is related to a Referred Client. The potential for this can occur if the Referred Client is also a client of the affiliate broker-dealer. This may present a conflict of interest as supervised persons may have an incentive to recommend investment products or services based on the compensation received. As such, SunGard monitors and reviews all additional compensation received. SunGard has policies and procedures designed to identify and address these potential conflicts of interest. Any conflicts or potential conflicts of interest will be noted in Part 2 of Form ADV which is delivered to the Referred Client as required. SunGard's Part 2 of Form ADV will also be delivered to the Third Party RIAs on an annual basis.

All arrangements between SunGard and the Third Party RIAs are documented by a written solicitation agreement that is separately negotiated with each Third Party RIA.

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

This item is not applicable to SunGard.

#### **Item 7 Types of Clients**

As referenced above, SunGard restricts its services to providing solicitation services to Third Party RIAs. SunGard does not custody any assets or provide account opening or trading services.

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

This item is not applicable to SunGard.

#### **Item 9 Disciplinary Information**

There are no legal or disciplinary events required to be disclosed pursuant to this Item 9.

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

SunGard is affiliated with two broker-dealers; SunGard Brokerage & Securities Services LLC ("SBSS") and SunGard Global Execution Services Limited ("SGES"). SBSS is a United States based SEC registered, Financial Industry Regulatory Authority ("FINRA") and New York Stock Exchange ("NYSE") member firm. SGES is based in the United Kingdom and is authorised and regulated by the Financial Conduct Authority. There are a number of individuals that are registered representatives of SBSS and/or are approved persons of SGES. As stated in Item 5 above, SunGard's supervised persons that are registered representatives or approved persons of one of SunGard's affiliated broker-dealers may have the potential to receive both a referral fee as well as compensation from the sale of a security or other investment product or service in the form of a brokerage commission as it is related to a Referred Client. The potential for this can occur if the Referred Client is also a client of the affiliate broker-dealer. This may present a conflict

of interest as supervised persons may have an incentive to recommend investment products or services based on the compensation received. As such, SunGard monitors and reviews all additional compensation received. SunGard has policies and procedures designed to identify and address these potential conflicts of interest.

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

SunGard has adopted policies and procedures designed to address conflicts of interest and a Code of Ethics, which includes a standard of business conduct and establishes policies and procedures with regard to personal securities transactions of SunGard's access persons.

SunGard's Code of Ethics includes, among other things:

- a standard of business conduct required of SunGard's supervised persons, consistent with fiduciary obligations applicable to SunGard;
- requirements that all supervised persons comply with applicable Federal securities laws;
- provisions that require all access persons to report relevant personal securities transactions and holdings periodically for review by SunGard;
- provisions requiring supervised persons to report any violations of the Code of Ethics promptly; and
- provisions that require all supervised persons to report any outside business activities to SunGard.

SunGard maintains compliance and personal trading policies. SunGard is not involved with trading or security selection and therefore has no interest or participation in the Third Party RIA advisory offerings. SBSS, one of SunGard's related persons, may buy or sell securities for its client accounts at or about the same time that it buys or sells the same securities for its own account. This may present a conflict of interest as SBSS may receive a better execution on a trade for its own account than the execution its client may receive when purchasing or selling the same security for their account. As such, SBSS has implemented internal controls including information barriers to ensure that activities conducted for its own account are conducted without knowledge of its client's account activities. SBSS has policies and procedures in place to identify and address any conflicts that may arise.

#### **Item 12 Brokerage Practices**

This item is not applicable to SunGard.

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

This item is not applicable to SunGard.

**Item 14 Client Referrals and Other Compensation**

As referenced above, SunGard restricts its services to providing solicitation services to Third Party RIAs. This item is not applicable to SunGard, as it has no advisory clients.

**Item 15 Custody**

This item is not applicable to SunGard.

**Item 16 Investment Discretion**

This item is not applicable to SunGard.

**Item 17 Voting Client Securities**

This item is not applicable to SunGard.

**Item 18 Financial Information**

This item is not applicable to SunGard as SunGard does not charge or solicit pre-payment of \$1200 in fees per client, six or more months in advance.

SunGard has no financial hardships or other conditions that are reasonably likely to impair its ability to meet its contractual obligations.

Neither SunGard nor any of its affiliates has ever been the subject of a bankruptcy petition.

**Item 19 Requirements for State-Registered Advisers**

This item is not applicable to SunGard as SunGard is not a State-Registered Adviser.