

ShareGro Inc.

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of ShareGro Inc. If you have any questions about the contents of this brochure, please contact us at (512) 655-9747 or by email at: abe@ShareGro.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 ShareGro Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. ShareGro Inc.'s CRD number is: 307197.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

ShareGro Inc. has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore, there are no material changes to report.

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Item 4: Advisory Business

A. Description of the Advisory Firm

ShareGro Inc. (hereinafter “ShareGro”) is a Corporation organized in the State of Delaware. The firm was formed in November 2019, and the principal owner is Adrian Bruce Early.

B. Types of Advisory Services

Robo-Advisory Portfolio Management Services

ShareGro provides “robo-advisory” portfolio management services via an online interface. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each member and based on individual characteristics, such as the member’s age, risk tolerance, income, and current assets, among others.

Services Limited to Specific Types of Investments

ShareGro generally limits its investment advice to Exchange Traded Funds (ETFs), fixed income ETFs, individual stock equities, mutual funds, and non-US securities. ShareGro may use other securities as well to help diversify a portfolio when applicable.

C. Member Tailored Services and Member Imposed Restrictions

ShareGro provides online “robo-advisory” portfolio management. Member accounts are generally invested into a target allocation depending on the member’s individual profile and rebalanced daily. This automated approach factors in member financial situation and risk tolerance, although the algorithms used to provide advisory services are designed to be utilized by ShareGro across multiple members. Members may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. ShareGro does not sponsor or participate in a wrap program.

E. Sharing Services

ShareGro provides a financial sharing or giving program to individual account holders. The purposes of this program include helping members add to and grow their accounts through matching of these additions by the peer to peer network of investors. The network also benefits from these additions since they increase the total resources available for future sharing matches. The overall sharing system forms a sharing of risk and reward added onto the wealth management platform. Please consult your CPA or tax planning professional for detailed tax planning but an overview we believe correct in the US is that net sharing transfers you receive are taxable to you, and net sharing from your account to the network is deductible by you.

Members agree to:

A) Members supply / receive tax deductible or taxable sharing to / from one another, an amount equal to 1.0 % annually of the value of their account, less any amounts of sharing received (C and D below). This net amount may be either a net cash flow out of or into your account. If the 1.0 % outflow is greater, you share a net amount with others. If the return flow (C and D) is greater, you receive net sharing.

B) The 1.0 % sharing is determined based on the average value of the account in the month immediately preceding the transfer.

C) 99 % of the 1.0 % sharing (0.99 % of assets; 99 basis points per year) is transferred in proportion to (as a match of) additions by participants in the sharing network. This enables participants adding even large sums to their accounts a substantial sharing match of the large amounts (nearly perfectly in proportion, differing by only the evenly distributed 1.0 % sharing).

D) The remaining 1.0 % of the 1.0 % (one basis point on total assets) donation for this sharing will be spread equally among all the participating accounts.

E) All net sharing is drawn from all participating accounts into an account for that purpose, and is then deposited in electronic time (quickly) directly into all receiving accounts.

F) Sharing transfers are in addition to and separate from, customary account maintenance fees.

G) Members are solely responsible to determine tax consequences of participation in ShareGro. We believe sharing transfers are taxable to the receiver, and deductible by the supplier of sharing, and report these numbers to members for their tax reporting, along with other gains and losses.

H) Members may not choose to exclude any participating members in this program, and may not change the total amount of their sharing in any way.

I) All net outbound sharing cash flows are ,transferred to a dedicated sharing account, then from that directly to the appropriate members determined by the ShareGro sharing algorithm.

F. Assets Under Management

ShareGro has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	May 2022

Item 5: Fees and Compensation

A. Fee Schedule

Robo-Advisory Portfolio Management Services Fees

Total Assets Under Management	Annual Fees
All Assets	0.24%

ShareGro will charge a monthly fee of \$3.00 for access to the app. ShareGro uses an average of the daily balance in the member's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the 0.24% (24 basis point) advisory fee is based.

The final fee schedule will be outlined in the member's advisory agreement. Members may terminate the agreement without penalty for a full refund of ShareGro's fees within five business days of signing the Investment Advisory Contract. Thereafter, members may terminate the Investment Advisory Contract generally with 30 days' written notice.

B. Payment of Fees

Payment of Robo-Advisory Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the member's accounts with member's written authorization on a monthly basis. Fees are paid in arrears.

C. Member Responsibility For Third Party Fees

Members are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by ShareGro. Please see Item 12 of this brochure regarding broker-dealer/custodian.

We collect and fully transfer to the Broker-Dealer / Custodian holding member assets ("Custodian"), brokerage commissions they charge for transactions in member accounts. We do not, in any way benefit from these transaction fees. We consider this crucial to maintain our fiduciary obligations to all members.

D. Prepayment of Fees

ShareGro collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Members

Neither ShareGro nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

F. Sharing Services Charges/Payments Summary

ShareGro management fees are \$ 3.00 per month (\$ 36.00 per year) plus 0.24 % per year of Assets Under Management (AUM) based on the average monthly balance and prorated for dissolution or formation.

Additionally, the Broker-Dealer / Custodian holding member assets ("Custodian"), may charge brokerage commissions independent of ShareGro for any transactions in member accounts, and we collect these for full transfer to the broker dealer.

Item 6: Performance-Based Fees and Side-By-Side Management

ShareGro does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a member.

Item 7: Types of Members

The minimum amount required to open and maintain an account with ShareGro is \$500. As a result of the automation associated with offering its services online, ShareGro makes it possible for retail investors to access its service with much lower account minimums than normally

available in the industry. Members have access to their Accounts through the Site. Additional requirements for opening an Account with ShareGro are described in Item 4 above.

At any time, a Member may terminate an Account, withdraw all or part of an Account (provided the Account balance does not fall below \$500 because of the withdrawal), or update their investment profile (i.e. risk score), which may initiate an adjustment in the Account's holdings. In that case, unless otherwise directed by the Member, ShareGro will sell the securities in the Member Account (or portion of the Account, in the case of a partial withdrawal or update) at market prices at or around the time of the termination, withdrawal or update. See Item 16 for a description of ShareGro Advisers' discretionary investment authority, including the timing of ShareGro Advisers' placement of Member trade orders. ShareGro Advisers seeks to respond to Member deposits, Member changes in risk profiles, Member withdrawal requests, including without limitation requests in connection with terminations, and other reasonable Member requests in a timely and reasonable manner. However, ShareGro Advisers does not represent or guarantee that ShareGro Advisers will respond to any such Member actions or requests immediately or in accordance with a set time schedule.

Investors evaluating ShareGro Advisers' software-based investment advisory service should be aware that ShareGro Advisers' relationship with Members is likely to be different from the "traditional" investment advisory relationship in several aspects:

1. ShareGro Advisers is a software-based investment adviser which means each Member must acknowledge their ability and willingness to conduct their relationship with ShareGro Advisers on an electronic basis. Under the terms of the Advisory Member Agreement and the Brokerage Agreement, each Member agrees to receive all Account information and Account documents (including this Brochure and the ShareGro Advisers Program Brochure), and any updates or changes to same, through the app and his or her access to the Site and ShareGro Advisers' electronic communications. Unless noted otherwise on the Site or within this Brochure, ShareGro Advisers' investment advisory service, Apex's brokerage services, the signature for the Advisory Member Agreement and the Brokerage Agreement, and all documentation related to the advisory services are managed electronically.
2. To provide its investment advisory services and tailor its investment decisions to each Member's specific needs, ShareGro Advisers collects information from each Member, including specific information about her investing profile such as financial situation, investment experience, and investment objectives. ShareGro Advisers maintains this information in strict confidence subject to its Privacy Policy, which is provided on the Site. When customizing its investment solutions, ShareGro Advisers relies upon the information received from a Member. Although ShareGro Advisers contacts its Members periodically as described further in Item 13 below, a Member must promptly notify ShareGro Advisers of any change in her financial situation or investment objectives that might require a review or revision of her portfolio
3. The software-based investment advisory service includes preselected ETFs and / or individual stocks (securities) for each asset class within the plan recommended to a Member.
4. Members may not place orders to purchase or sell securities on a self-directed basis.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

ShareGro's methods of analysis include Fundamental analysis, Modern portfolio theory and Quantitative analysis, and we enable easy, yet we think sophisticated rebalancing of member portfolios.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets.

Quantitative analysis deals with measurable factors such as the value of assets, the cost of capital, historical projections of sales, and so on, as distinguished from qualitative considerations such as the character of management or the state of employee morale.

Rebalancing has as its goal to keep exposure to positions in the portfolio at (or near) the desired level decided in advance. In our case, this also serves as a trading strategy with the additional goal of reducing declines in difficult markets, and seeking enhanced returns in growth periods. There can be no assurance we will meet these additional goals.

Investment Strategies

ShareGro uses long-term investing and may also engage in short term trading.

Investing in securities involves a risk of loss that you, as a member, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value or long term value including growth. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Investment Strategies

Long term investing is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose members to various types of risk that will typically surface at various intervals during the time the member owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a member, should be prepared to bear.

C. Risks of Specific Securities Utilized

Members should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a member, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither ShareGro nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither ShareGro nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Adrian Bruce Early is an investment adviser representative with another investment advisory firm, StockRoller, and from time to time, could offer members advice or products

from those activities. Members should be aware that these services may involve a conflict of interest. By policy and action ShareGro always acts in the best interest of the member and members are in no way required to use the services of Mr. Early or any representative of ShareGro in connection with such individual's activities outside of ShareGro.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

ShareGro does not utilize nor select third-party investment advisers.

Item 11: Code of Ethics, Participation or Interest in Member Transactions and Personal Trading

A. Code of Ethics

ShareGro has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. ShareGro's Code of Ethics is available free upon request to any member or prospective member.

B. Recommendations Involving Material Financial Interests

ShareGro does not recommend that members buy or sell any security in which a related person to ShareGro or ShareGro has a material financial interest.

C. Investing Personal Money in the Same Securities as Members

From time to time, representatives of ShareGro may buy or sell securities for themselves that they also recommend to members. This may provide an opportunity for representatives of ShareGro to buy or sell the same securities before or after recommending the same securities to members resulting in representatives profiting off the recommendations they provide to members. Such transactions may create a conflict of interest. ShareGro will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the member's disadvantage when similar securities are being bought or sold. Normally ShareGro team members are also ShareGro members themselves, and thus invest alongside other members, especially using block trades for all participants.

D. Trading Securities At/Around the Same Time as Members' Securities

From time to time, representatives of ShareGro may buy or sell securities for themselves at or around the same time as members. This may provide an opportunity for representatives of ShareGro to buy or sell securities before or after recommending securities to members resulting in representatives profiting off the recommendations they provide to members. Such transactions may create a conflict of interest; however, ShareGro will never engage in trading that operates to the member's disadvantage if representatives of ShareGro buy or sell securities at or around the same time as members.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on ShareGro's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a member on the most favorable terms for the member under the circumstances. Members will not necessarily pay the lowest commission or commission equivalent, and ShareGro may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in ShareGro's research efforts. ShareGro will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

ShareGro recommends Apex for brokerage and custodial services.

1. Research and Other Soft-Dollar Benefits

While ShareGro has no formal soft dollars program in which soft dollars are used to pay for third party services, ShareGro may receive research, products, or other services from custodians and broker-dealers in connection with member securities transactions ("soft dollar benefits"). ShareGro may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular member will benefit from soft dollar research, whether or not the member's transactions paid for it, and ShareGro does not seek to allocate benefits to member accounts proportionate to any soft dollar credits generated by the accounts. ShareGro benefits by not having to produce or pay for the research, products or services, and ShareGro will have an incentive to recommend a broker-dealer based on receiving research or services. Members should be aware that ShareGro's acceptance of soft dollar benefits may result in higher commissions charged to the member.

2. Brokerage for Member Referrals

ShareGro receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Members Directing Which Broker/Dealer/Custodian to Use

ShareGro requires members to use a specific broker-dealer to execute transactions, Apex.

B. Aggregating (Block) Trading for Multiple Member Accounts

In such a case, ShareGro will place an aggregate order with the broker on behalf of all such members in order to ensure fairness for all members. Trades will be periodically reviewed to ensure that accounts are not systematically disadvantaged by this policy. ShareGro will determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek the best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Robo-advisory portfolio management accounts are not reviewed by ShareGro, save for automated allocation revisions. Clients are encouraged to update their account with any change in their objectives, risk tolerance, or other pertinent information, as that information factors into the portfolio's composition.

B. Factors That Will Trigger a Non-Periodic Review of Member Accounts

Robo-advisory portfolio management accounts do not undergo non-periodic review by ShareGro, although allocations may change based on material market, economic, or political events and/or changes to the client's profile in accordance with ShareGro's automated portfolio management.

C. Content and Frequency of Regular Reports Provided to Members

Robo-advisory portfolio management clients will receive at least quarterly a written report that details the client's account including assets held and asset value, which report will come from the custodian.

Item 14: Members Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Members (Includes Sales Awards or Other Prizes)

ShareGro does not receive any economic benefit, directly or indirectly from any third party for advice rendered to ShareGro's members.

B. Compensation to Non - Advisory Personnel for Member Referrals

ShareGro does not compensate non-advisory personnel (solicitors) for member referrals. Members can receive one month of the application charges of \$3.00 as a referral fee per referral.

Item 15: Custody

When advisory fees are deducted directly from member accounts at member's custodian, ShareGro will be deemed to have limited custody of member's assets and must have written authorization from the member to do so. Members will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

ShareGro provides discretionary and non-discretionary investment advisory services to members. The advisory contract established with each member sets forth the discretionary authority for trading. Where investment discretion has been granted, ShareGro generally manages the member's account and makes investment decisions without consultation with the member as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Member Securities (Proxy Voting)

ShareGro will not ask for, nor accept voting authority for member securities. Members will receive proxies directly from the issuer of the security or the custodian. Members should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

ShareGro neither requires nor solicits prepayment of more than \$1,200 in fees per member, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Members

Neither ShareGro nor its management has any financial condition that is likely to reasonably impair ShareGro's ability to meet contractual commitments to members.

C. Bankruptcy Petitions in Previous Ten Years

ShareGro has not been the subject of a bankruptcy petition.