

FIT Strategic Advisors LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of FIT Strategic Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (714) 612-5237 or by email at: Ron@FITstrategic.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 FIT Strategic Advisors LLC is also available on the SEC's website at www.adviserinfo.sec.gov. FIT Strategic Advisors LLC's CRD number is: 299702.

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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

FIT Strategic Advisors, LLC has the following material changes to report. Material changes relate to FIT Strategic Advisors, LLC's policies, practices or conflicts of interest.

- John Nguyen is no longer an owner of the firm (Item 4).
- FIT has updated pension consulting, outside compensation and outside business activities (Item 5, Item 10).
- FIT now has a minimum account size (Item 7).
- FIT has updated risks of specific securities utilized (Item 8).
- FIT has updated brokerage practices to reflect a new custodian that is required to be used by clients (Item 12).
- FIT has updated additional benefits from Charles Schwab and client referrals (Item 14).

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Item 4: Advisory Business

A. Description of the Advisory Firm

FIT Strategic Advisors LLC (hereinafter "FSA") is a Limited Liability Company organized in the State of California. The firm was formed in September 2018, and the principal owner is Ronald Gordon Kring.

B. Types of Advisory Services

Portfolio Management Services

FSA offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. FSA creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

FSA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. FSA will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

FSA seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of FSA's economic, investment or other financial interests. To meet its fiduciary obligations, FSA attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, FSA's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is FSA's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Selection of Other Advisers

FSA may direct clients to third-party investment advisers. Before selecting other advisers for clients, FSA will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where FSA is recommending the adviser to clients.

Pension Consulting Services

FSA offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

Services Limited to Specific Types of Investments

FSA generally limits its investment advice to mutual funds, fixed income securities, options, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, structured products, non-U.S. securities, venture capital funds and private placements. FSA may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

FSA will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by FSA on behalf of the client. FSA may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may not 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. FSA does not participate in wrap fee programs.

E. Assets Under Management

FSA has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$7,779,004	\$0	December 2019

Item 5: Fees and Compensation

A. Fee Schedule

Lower fees for comparable services may be available from other sources.

Portfolio Management Fees

Total Assets Under Management	Annual Fees
All Assets	Up to 2.00%

FSA uses an average of the daily balance in the client'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 advisory fee is based.

The final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of FSA's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

Selection of Other Advisers Fees

FSA may direct clients to third-party investment advisers. FSA will receive its standard fee on top of the fee paid to the third-party adviser. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

FSA may specifically direct clients to Zacks Investment Management, Inc. The annual fee schedule is as follows:

Total Assets	FSA's Fee	Zacks Investment Management's Fee	Total Fee
All Assets (SMA accounts)	Up to 2.00%	0.28%	Up to 2.28%
All Assets (ETF accounts)	Up to 2.00%	0.18%	Up to 2.18%

Pension Consulting Services Fees

Asset-Based Fees for Pension Consulting

Total Assets Under Management	Annual Fee
\$0 - And Up	Up to 1.00%

FSA uses an average of the daily balance in the client'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 advisory fee is based.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement.

Clients may terminate the agreement without penalty for a full refund of FSA's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement generally with 30 days' written notice.

Fixed Fees

The rate for creating client pension consulting plans is \$2,500. The final fee schedule will be memorialized in the client's advisory agreement. This service may be canceled with 30 days' notice.

Hourly Fees

The hourly fee for these services is between \$150 and \$300. The final fee schedule will be memorialized in the client's advisory agreement.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is \$2,500.

Hourly Fees

The negotiated hourly fee for these services is between \$150 and \$300.

Clients may terminate the agreement without penalty, for full refund of FSA's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

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

Payment of Selection of Other Advisers Fees

Fees are paid quarterly in advance. Fees for selection of Zacks Investment Management, Inc. are withdrawn directly from the client's accounts by FSA with client's written authorization.

Payment of Pension Consulting Fees

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

Fixed pension consulting fees are paid via check. These fees are paid in arrears upon completion.

Hourly pension consulting fees are paid in arrears upon completion.

Payment of Financial Planning Fees

Financial planning fees are paid via check, cash and wire.

Fixed financial planning fees are paid in arrears upon completion.

Hourly financial planning fees are paid in arrears upon completion.

C. Client Responsibility For Third Party Fees

Clients 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 FSA. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

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

E. Outside Compensation For the Sale of Securities to Clients

John Danh Nguyen, Kamron Nahavandi, Brandon L Rivera and Everton Antonio Robinson are registered representatives of a broker-dealer and insurance agents and, in these roles, accept compensation for the sale of investment products to FSA clients.

1. *This is a Conflict of Interest*

The supervised persons listed above may accept compensation for the sale of investment products arranged through their associated broker-dealers or insurance products arranged through their associated insurance agencies, including asset based sales charges or service fees from the sale of mutual funds to FSA's clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of investment products for which the supervised persons receives compensation, FSA will document the conflict of interest in the client file and inform the client of the conflict of interest.

2. *Clients Have the Option to Purchase Recommended Products From Other Brokers*

Clients always have the option to purchase FSA recommended products through other brokers or agents that are not affiliated with FSA.

3. *Commissions are not FSA's primary source of compensation for advisory services*

Commissions are not FSA's primary source of compensation for advisory services.

4. *Advisory Fees in Addition to Commissions or Markups*

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on investment products recommended to clients.

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

FSA 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 client.

Item 7: Types of Clients

FSA generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is an account minimum of \$100,000, which may be waived by FSA in its discretion.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

FSA's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory and Technical analysis.

Charting analysis involves the use of patterns in performance charts. FSA uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

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 asset.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

FSA uses long term trading, short term trading, margin transactions and options trading (including covered options, uncovered options, or spreading strategies).

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

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

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. 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.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

FSA's use of margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client 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.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the 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 client, should be prepared to bear.

C. Risks of Specific Securities Utilized

FSA's use of margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) 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. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official

sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

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.

Structured Products are financial instruments which consist of various elemental components combined to generate a specific risk-return profile. Risks of structured products may include credit risk of the issuer, market risk, income risk, liquidity risk, call features, complex payout structures and/or foreign currency risks.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, 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

As registered representatives of Crown Capital Securities, L.P., John Danh Nguyen, Kamron Nahavandi, Brandon L. Rivera and Everton Antonio Robinson accept compensation for the sale of securities.

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

Neither FSA 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

John Danh Nguyen, Kamron Nahavandi, Brandon L. Rivera and Everton Antonio Robinson are registered representatives of Crown Capital Securities, L.P. and from time

to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. FSA always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of FSA in such individual's capacity as a registered representative.

John Danh Nguyen, Kamron Nahavandi, Brandon L. Rivera and Everton Antonio Robinson are investment adviser representatives with another investment advisory firm, Crown Capital Securities, L.P., and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. FSA always acts in the best interest of the client and clients are in no way required to use the services of any representative of FSA in connection with such individual's activities outside of FSA.

John Danh Nguyen is a licensed insurance agent, and he owns his own insurance agency; J&N Partnership Financial, Inc, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. FSA always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of FSA in connection with such individual's activities outside of FSA.

Kamron Nahavandi, Brandon L. Rivera and Everton Antonio Robinson are licensed insurance agents. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. FIT Strategic Advisors LLC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of FIT Strategic Advisors LLC in such individual's outside capacities.

John Danh Nguyen is a licensed real estate agent of HT Realty Inc., and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. FSA always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of FSA in connection with such individual's activities outside of FSA.

John Danh Nguyen is a partner, CFO and 50% owner in a tax and accounting firm, FITax Planning, Inc., and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services may involve a conflict of interest. FSA always acts in the best interest of the client and clients are in no way required to use the services of any representative of FSA in connection with such individual's activities

outside of FSA.

All material conflicts of interest under Section 260.238 (k) of the California Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

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

FSA may direct clients to third-party investment advisers. Clients will pay FSA its standard fee in addition to the standard fee for the advisers to which it directs those clients. The fees will not exceed any limit imposed by any regulatory agency. FSA will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. FSA will ensure that all recommended advisers are exempt, licensed or notice filed in the states in which FSA is recommending them to clients.

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

A. Code of Ethics

FSA 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. FSA's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of FSA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of FSA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. FSA will always document any

transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

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

Item 12: Brokerage Practices

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

Custodians/broker-dealers will be recommended based on FSA's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and FSA 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 FSA's research efforts. FSA will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

FSA will require clients to use Charles Schwab & Co., Inc. Advisor Services.

1. Research and Other Soft-Dollar Benefits

While FSA has no formal soft dollars program in which soft dollars are used to pay for third party services, FSA may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). FSA 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 client will benefit from soft dollar research, whether or not the client's transactions paid for it, and FSA does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. FSA benefits by not having to produce or pay for the research, products or services, and FSA will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that FSA's acceptance of soft dollar benefits may result in higher commissions charged to

the client.

2. Brokerage for Client Referrals

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

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

FSA will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If FSA buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, FSA would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. FSA would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with FSA's duty to seek 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

All client accounts for FSA's advisory services provided on an ongoing basis are reviewed at least Quarterly by Ronald G Kring, President, with regard to clients' respective investment policies and risk tolerance levels. All accounts at FSA are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Ronald G Kring, President. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

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

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, FSA's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of FSA's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and fees paid to the advisor. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

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

FSA receives compensation from third-party advisers to which it directs clients.

Charles Schwab & Co., Inc. Advisor Services provides FSA with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services 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 Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, 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. For FSA client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to FSA other products and services that benefit FSA but may not benefit its clients' accounts. These benefits may include national, regional or FSA specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of FSA by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist FSA in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate

trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of FSA's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of FSA's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to FSA other services intended to help FSA manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to FSA by independent third parties. Charles Schwab & Co., Inc. Advisor Services 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 FSA. FSA is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

FSA has selling agreements with various sponsors of Private Placement investment programs ("Program Sponsors"). These Program Sponsors and/or their affiliates will, from time to time, make available to FSA other products and services that benefit FSA but may not benefit FSA clients' accounts. These benefits may include national, regional or FSA specific educational or due diligence programs organized and/or supported financially by Program Sponsors and/or their affiliates. In addition to the information received by FSA personnel at these programs, other benefits may include reimbursement or direct payment for travel, ground transportation, lodging and meals related to these programs. Other potential benefits may include occasional business entertainment of personnel of FSA by personnel of Program Sponsors and/or their affiliates, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational or due diligence opportunities.

FSA has an agreement with Cantor Fitzgerald, whereby FSA acts as an intermediary to introduce prospective depositors to Cantor Fitzgerald's "FICA For Advisors Program", also known as the "Cantor Fitzgerald Insured Cash Account Program" or "CF Cash Program." In the event a prospective depositor establishes an account in this program, they shall be considered by Cantor Fitzgerald to be an Introduced Depositor, and Cantor Fitzgerald will pay to FSA an administrative fee of 15 basis points (0.0015%) (which is expressed herein as an annualized amount, and shall be payable to FSA on a monthly basis in an amount equal to 1/12th of the fee specified) of the average daily balance of the amounts in the Introduced Depositor Account for the applicable month. Introduced Depositors will not be charged any fees by FSA.

B. Compensation to Non - Advisory Personnel for Client Referrals

FSA may, via written arrangement, retain third parties to act as solicitors for FSA's investment management services. All compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. FSA will ensure each solicitor is properly registered in all appropriate jurisdictions. FSA will ensure that

the compensated person will be properly registered as a solicitor and follow CCR 260.236(c)(2) requirements.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, FSA will be deemed to have limited custody of client's assets. Because client fees will be withdrawn directly from client accounts, in states that require it, FSA will:

- (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
- (C) Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from custodian with those they received from FSA.

Item 16: Investment Discretion

FSA provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, FSA generally manages the client's account and makes investment decisions without consultation with the client 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. In some instances, FSA's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to FSA.)

Item 17: Voting Client Securities (Proxy Voting)

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

Item 18: Financial Information

A. Balance Sheet

FSA neither requires nor solicits prepayment of more than \$500 in fees per client, 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 Clients

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

C. Bankruptcy Petitions in Previous Ten Years

FSA has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

The education and business backgrounds of FSA's current management person, Ronald Gordon Kring, can be found on the Form ADV Part 2B brochure supplement for that individual.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

FSA 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 client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.