

Strategic Foresight Investments

Form ADV Part 2A – Disclosure Brochure

Effective: February 16, 2018

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Strategic Foresight Investments (“StratFI” of the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (302) 884-6742 or by email at jlee@stratfi.com.

StratFI is a registered investment advisor with the State of Delaware. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about StratFI to assist you in determining whether to retain the Advisor.

Additional information about StratFI and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 164744.

Strategic Foresight Investments
1201 N. Orange Street, Suite 742
Wilmington, DE 19801-1186
www.stratfi.com

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of StratFI. For convenience, we have combined these documents into a single disclose document.

StratFI believes that communication and transparency are the foundation of its relationship and continually strive to provide its Clients with complete and accurate information at all times. StratFI encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

There have been no material changes to our Disclosure Brochure since the last filing and distribution to Clients.

Future Changes

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 by the securities regulators. 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 StratFI.

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 by searching with our firm name or our CRD# 164744. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (302) 884-6742 or by email at jlee@stratfi.com.

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1201 N. Orange Street, Suite 742, Wilmington, DE 19801-1186
Phone: (302) 884-6742 Fax: (302) 573-2507

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Item 4 – Advisory Services

A. Firm Information

Strategic Foresight Investments (“StratFI” or the “Advisor”) is a registered investment advisor located in the State of Delaware, which is organized as a Limited Liability Company (“LLC”) under the laws of State of Delaware. StratFI was founded in September 2012 and is owned and operated by Mr. James H. Lee (Founder). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by StratFI.

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

B. Advisory Services Offered

StratFI offers investment advisory services to individuals, high net-worth individuals, personal trusts, estates, businesses, investment companies, charitable organizations, and other investment advisors in Delaware and other states (each referred to as a “Client”).

Investment Management Services

StratFI provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. StratFI works with each Client to identify their investment goals, objectives, risk tolerance, and financial situation in order to create a portfolio strategy. StratFI will then construct a portfolio, consisting of a broad range of investment vehicles, including individual securities, mutual funds, exchange-traded funds (“ETFs”), closed-end funds, and options to achieve the Client’s investment goals. Multi-strategy portfolios may be geared for growth or income. Each portfolio is tailored to meet the needs and preferences of the client.

StratFI’s investment approach is oriented toward mid- to long-term holding periods. The Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. StratFI will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

For individual stock portfolios, the Advisor primarily utilizes a multi-cap GARP (“growth at a reasonable price”) discipline. This involves several distinct forms of analysis.

- **Strategic Foresight** is used to develop investment themes based on STEEP trends (social, technological, economic, ecological, and political).
- **Fundamental** accounting analysis determines individual security selection.
- **Technical** sentiment indicators identify appropriate entry and exit points.

Together, these three disciplines provide a framework for answering the questions of *where*, *how*, and *when* to invest.

StratFI evaluates and selects assets for inclusion in Client portfolios only after applying an internal due diligence process. Periodically, StratFI may recommend:

- Redistributing investment allocations to diversify the portfolio.
- Specific positions to increase sector or asset class weightings.
- Employing cash positions or inverse ETFs to mitigate the effects of market volatility.

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- Selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

StratFI will provide investment advisory services and related services. At no time will StratFI accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. Please see Item 12 – Brokerage Practices.

Consulting Services

StratFI will typically provide a variety of consulting services to Clients who do not meet the minimum assets under management amount described in Item 7 below, pursuant to a written Consulting Agreement.

Generally, such services will involve rendering a financial consultation based on the Client's goals and objectives. This consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings, portfolio construction, asset allocation and other areas of a Client's financial situation.

A financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For consulting engagements, the Advisor may or may not provide a written summary. Consultations are typically completed within three months of contract date, assuming all information and documents requested are provided promptly.

Consulting Clients are not obligated to implement any recommendations made by the Advisor may or may not maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to execute the transaction through the Advisor.

C. Client Account Management

Prior to engaging StratFI to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – StratFI, in connection with the Client, will develop an investment strategy that seeks to achieve the Client's investment goals and objectives.
- Portfolio Construction – StratFI will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – StratFI will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

StratFI does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by StratFI.

E. Assets Under Management

As of December 31, 2017, StratFI manages approximately \$19,400,000 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of StratFI and the Client.

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A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid monthly, at the end of each month, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of each month and range from 0.75% to 1.00% based on the following schedule:

Assets Under Management	Annual Rate
First \$2,000,000	1.00%
Over \$2,000,000	0.75%

The investment advisory fee in the first month of service is prorated from the inception date of the account[s] to the end of the first month. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by StratFI will be independently valued by the Custodian. StratFI will not have the authority or responsibility to value portfolio securities.

Consulting Services

StratFI offers consulting services on an hourly basis at a rate of \$250 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and costs will be determined prior to engaging for these services.

The Advisor's fee is exclusive of brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these fees, costs, and expenses.

B. Fee Billing

Investment Management Services

Investment advisory fees will be calculated by the Advisor and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective month-end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with StratFI at the end of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting StratFI to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Consulting Services

Consulting fees are invoiced by the Advisor and due upon completion of the engagement deliverable[s].

C. Other Fees and Expenses

Clients may incur certain fees or expenses imposed by third parties in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The investment advisory fee charged by StratFI is separate and distinct from these custody and execution fees.

In addition, all fees paid to StratFI for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible

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distribution fee. A Client may be able to invest in these products directly, without the services of StratFI, but would not receive the services provided by StratFI which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by StratFI to fully understand the total fees to be paid.

D. Payment of Fees and Termination

Investment Management Services

StratFI is compensated for its services at the end of each month, after investment advisory services are rendered. Either party may terminate the investment advisory agreement with StratFI, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without Client's prior consent.

Consulting Services

StratFI is compensated for its consulting services upon completion of the engagement deliverable[s]. Either party may terminate a consulting agreement, at any time, by providing written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the project times the agreed-upon hourly rate. The Client's consulting agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

StratFI does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

StratFI does not charge performance-based fees for its investment advisory services. The fees charged by StratFI are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

StratFI does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

StratFI provides investment advisory services to individuals and high net worth individuals. The Advisor may also provide services to personal trusts, estates, businesses, investment companies, charitable organizations, and other investment advisors. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. StratFI generally requires a minimum relationship size of \$250,000, which may be reduced at the sole discretion of the Advisor.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

StratFI employs a fundamental and technical analysis method in developing investment strategies for its Clients. Research and analysis from StratFI is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities (including annual reports, prospectuses, press releases and research prepared by others).

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that StratFI will be able to accurately predict such a reoccurrence.

As noted above, StratFI generally employs a mid- to long-term investment strategy for its Clients, as consistent with their financial goals. StratFI will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, StratFI may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and the fundamental/technical qualities of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. StratFI will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment priorities, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the potential speculative components of the Advisor's strategy:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

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The performance of a mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving StratFI or any of its Supervised Persons. StratFI values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 164744.

Item 10 – Other Financial Industry Activities and Affiliations

Teach the Future Foundation

Mr. Lee is the Volunteer Treasurer for the Teach the Future Foundation. His duties include bookkeeping and strategic planning for the foundation. Although there is an affiliation with a Client of StratFI the funds are separate from those at StratFi. Mr. Lee generally does not spend more than 2 hours a week on this activity.

From time to time, Mr. Lee may write books, articles, and engage in public speaking.

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

A. Code of Ethics

StratFI has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. The Code applies to all persons associated with StratFI (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. StratFI and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of StratFI Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that may address ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (302) 884-6742 or via email at jlee@stratfi.com.

B. Personal Trading with Material Interest

StratFI allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. StratFI does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. StratFI does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

StratFI allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts,

Supervised Persons of StratFI may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by StratFI requiring reporting of personal securities trades by its Supervised Persons for review by the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

D. Personal Trading at Same Time as Client

While StratFI allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time, will StratFI or any Supervised Person of StratFI, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

StratFI does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize StratFI to direct trades to the Custodian as agreed in the investment advisory agreement. Further, StratFI does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where StratFI does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by StratFI. StratFI may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian's offices. StratFI will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". StratFI maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. For additional information, please see Item 14 below.

The following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. **StratFI does not participate in soft dollar programs sponsored or offered by a broker-dealer/custodian. However, the Advisor does receive certain economic benefits from the Custodian.**

2. Brokerage Referrals - StratFI does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where StratFI will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). StratFI will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. StratFI will execute its transactions through the Custodian as directed by the Client. StratFI may aggregate orders in a block trade or trades when securities are purchased or sold through the same Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in

full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Lee, Founder of StratFI. Formal reviews are generally conducted at least quarterly, but typically on a monthly basis. Reviews may be more or less frequent depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify StratFI if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by StratFI

StratFI is a fee-based advisory firm and is compensated by the Client for management services. StratFI does not receive commissions or other compensation from product sponsors, broker dealers. StratFI may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, StratFI may receive referrals of new Clients from a third party.

Participation in Institutional Advisor Platform

StratFI has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like StratFI. As a registered investment advisor participating on the Schwab Advisor Services platform, StratFI receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its

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relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and financial support to StratFI that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. StratFI believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Client Referrals from Solicitors

StratFI does not engage paid solicitors for Client referrals.

Item 15 – Custody

StratFI does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct StratFI to utilize the Custodian for the Client's security transactions. StratFI encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12.

Item 16 – Investment Discretion

StratFI generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by StratFI. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by StratFI will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

StratFI does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting

Item 18 – Financial Information

Neither StratFI, nor its management, has any adverse financial situations that would reasonably impair the ability of StratFI to meet all obligations to its Clients. Neither StratFI, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. StratFI is not required to deliver a balance sheet along with this Disclosure Brochure as the firm does not collect fees of \$500 for services to be performed six months or more in advance.

Item 19 – Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officer

The Founder of StratFI is James H. Lee. Information regarding the formal education and background of Mr. Lee is included in Item 2 of Part 2B below.

B. Other Business Activities of Principal Officer

Teach the Future Foundation

Mr. Lee is the Volunteer Treasurer for the Teach the Future Foundation. His duties include bookkeeping and strategic planning for the foundation. Although there is an affiliation with a Client of StratFI the funds are separate from those at StratFI. Mr. Lee generally does not spend more than 2 hours a week on this activity.

Periodically, Mr. Lee may also accept engagements as a public speaker and author.

C. Performance Fee Calculations

StratFI does not charge performance-based fees for its investment advisory services. The fees charged by StratFI are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding StratFI or Mr. Lee. Neither StratFI nor Mr. Lee has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against StratFI or Mr. Lee.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding StratFI or Mr. Lee.***

E. Material Relationships with Issuers of Securities

Neither StratFI nor Mr. Lee has any relationships or arrangements with issuers of securities.

Form ADV Part 2B – Brochure Supplement

for

**James H. Lee, CFP[®], CFA, CMT
Founder**

Effective: February 16, 2018

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of James H. Lee (CRD# **2156828**) in addition to the information contained in the Strategic Foresight Investments (“StratFI” or the “Advisor” with CRD# 164744) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the StratFI Disclosure Brochure or this Brochure Supplement, please contact us at (302) 884-6742 or by email at jlee@stratfi.com.

Additional information about Mr. Lee is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Strategic Foresight Investments

1201 N. Orange Street, Suite 742, Wilmington, DE 19801-1186
Phone: (302) 884-6742 Fax: (302) 573-2507

www.stratfi.com

Item 2 – Educational Background and Business Experience

The Founder of StratFI is James H. Lee. Mr. Lee, born in 1969, is a dedicated Investment Manager for Client accounts. Mr. Lee obtained his M.S. degree in Studies of the Future from the University of Houston-Clear Lake in 2007. Previously, Mr. Lee graduated with a B.A. in Economics from The College of William and Mary in 1991. Mr. Lee is a Certified Financial Planner (CFP®), Chartered Financial Analyst (CFA), and a Chartered Market Technician (CMT). Additional information regarding Mr. Lee's employment history is included below.

Employment History:

Founder, Strategic Foresight Investments	09/2012 to Present
Author and public speaker	03/2011 to Present
Investment Manager, Lau Associates	01/1998 to 03/2011
Financial Planner, American Express Financial Advisors	07/1991 to 12/1997

Professional Designation: Certified Financial Planner ("CFP")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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Professional Designation: Chartered Financial Analyst (“CFA”)

The Chartered Financial Analyst (“CFA”) charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Professional Designation: Chartered Market Technician (“CMT”)

The Chartered Market Technician (CMT) Program requires candidates to demonstrate proficiency in a broad range of topics in the field of <http://www.mta.org/eweb/dynamicpage.aspx?webcode=what-is-technical-analysis> Technical Analysis. The Program consists of three levels. The CMT Level I and CMT Level II exams are multiple choice while CMT Level III exam is in short answer and essay form. Those candidates who successfully complete all three levels of the CMT examination and agree to abide by the Market Technicians Association Code of Ethics are granted the right to use the CMT credential.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Lee. Mr. Lee has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Lee.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Lee.*** However, we do encourage you to independently view the background of Mr. Lee on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2156828.

Item 4 – Other Business Activities

Teach the Future Foundation

Mr. Lee is the Volunteer Treasurer for the Teach the Future Foundation. His duties include bookkeeping and strategic planning for the foundation. Although there is an affiliation with a Client of StratFi the funds are separate from those at StratFi. Mr. Lee will spend no more than 2 hours a week on this activity.

Mr. Lee is also an author and public speaker.

Item 5 – Additional Compensation

Mr. Lee may periodically receive engagement fees, royalties, and honoraria for writing and public speaking. This may occur independently or in conjunction with his activities involving StratFi.

Item 6 – Supervision

Mr. Lee serves as the Founder and Chief Compliance Officer of StratFi. Mr. Lee can be reached at (302) 884-6742. StratFi has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of StratFi. Further, StratFi is subject to regulatory oversight by various agencies. These agencies require registration by StratFi and its Supervised Person. As a registered entity, StratFi is subject to examinations by regulators, which may be announced or unannounced. StratFi is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

Mr. Lee does not have any additional information to disclose.

Privacy Policy

Effective: February 16, 2018

Our Commitment to You

Strategic Foresight Investments LLC (“StratFI” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor. StratFI (also referred to as “we”, “our” and “us” throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

StratFI does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

Why you need to know?

Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What sources do we collect information from in addition to you?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA’s services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
<p>Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to:</p> <ul style="list-style-type: none"> • Processing transactions; • General account maintenance; • Responding to regulators or legal investigations; and • Credit reporting, etc. 	<p>StratFI may share this information.</p>	<p>Clients cannot limit the Advisor's ability to share.</p>
<p>Administrators We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>	<p>StratFI may share this information.</p>	<p>Clients cannot limit the Advisor's ability to share.</p>
<p>Marketing Purposes StratFI does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where StratFI or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.</p>	<p>StratFI does not share personal information.</p>	<p>Clients cannot limit the Advisor's ability to share.</p>
<p>Authorized Users In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.</p>	<p>StratFI does share personal information.</p>	<p>Clients can limit the Advisor's ability to share.</p>
<p>Information About Former Clients StratFI does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.</p>	<p>StratFI does not share personal information regarding former clients</p>	<p>Clients can limit the Advisor's ability to share.</p>

How do we protect your information?
<p>To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.</p>
<p>Our employees are advised about StratFI's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.</p>
<p>We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.</p>

Changes to our Privacy Policy.

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Questions: You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (302) 884-6742 or via email at jlee@stratfi.com.