

ADV form 2A for  
Strategic Asset Management LLC  
33442 First Way South  
Suite #201  
Federal Way, WA 98003

253-927-0998  
[www.sasm.com](http://www.sasm.com)

Dated March 25, 2013

This brochure provides information about the qualifications and business practices of Strategic Asset Management LLC.

If you have any questions about the contents of this brochure, please contact us at 253-927-0998 or [solutions@sasm.com](mailto:solutions@sasm.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 Strategic Asset Management LLC (IARD/CRD# 117549) also is available on the SEC's website at <http://www.adviserinfo.sec.gov>

## **Material changes in last 12 months**

Note: Only material changes in the last 12 months are included on this page.

The company moved locations to:

33442 First Way South

Suite #201

Federal Way, WA 98003

Email, phone, web, and other contact information remain the same

The company has no further business operations in Tacoma.

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## Advisory Business

Strategic Asset Management (SAM) started in 1994 as a sole proprietorship and converted to a LLC format in 2010. The sole owner is Greg Merrill of Tacoma, WA, USA.

Strategic Asset Management LLC (SAM) provides money management to clients on a percentage of assets under management. Money management entails the purchase and sale of securities by SAM in the client's account. Through consultation with the client SAM determines the best securities to purchase on the clients behalf. Continuing conversations with the client ensure that the initial parameters/instructions for the account have not changed. SAM continuously monitors the portfolio to ensure performance.

Clients may impose restrictions on certain types of securities, such as 'sin' stocks (liquor, tobacco, military)

Strategic Asset Management converted from a sole proprietorship to a limited liability corporation (LLC) on July 1<sup>st</sup> 2010.

As of 12/31/2012 Strategic Asset Management LLC advised approximately 7.0 million dollars on a discretionary basis.

## Fees and compensation

Fees are currently as follows:

### Annual Fee Schedule

First	\$100,000	=	1.75%
Next	\$900,000	=	0.75%
Above	\$1,000,000	=	0.60%

Fees are prepaid quarterly and deducted from client accounts based upon the size of the account as determined by the custodian on the last day of the previous calendar quarter. The client may at any time revoke the contract (in writing) and receive a pro-rata refund of the unused fees.

Fees are not negotiable except for relatives.

Client may choose to open accounts with Strategic to 'park' money or as a savings / checking account. Strategic will not charge a fee for these accounts but shall neither advise nor invest this parked money for the client.

Clients will pay other fees and commissions to other parties during the course of the relationship with SAM. Currently no custodian fees are charged by the broker/dealer SAM recommends but trade commissions and mutual fund expenses will be charged to the client. Currently trade commissions are approximately 16.99 per trade but the broker/dealer does reduce this charge for some trades depending upon the size of the account as well as what type of securities are purchased.

Clients have the unconditional right to cancel their agreement with SAM within five business days after execution of the contract and to receive a complete refund of any advance fee actually paid and without any penalty. If such notice of refund is given after five business days, fees are refundable for any portion of advanced fees attributable to services not performed before the termination of their contract.

SAM does not receive any compensation from any outside source for the sale of securities or other investment products.

### **Performance based fees**

SAM does not accept any performance-based fees.

### **Types of clients**

All clients of SAM are individuals with a combination of taxable, IRA, Roth IRA, 401(k) and Education accounts. There are no minimums for opening an account; however for accounts with less than \$50,000 an auto deposit of at least \$100 dollars a month must be set up at the same time. Relatives are exempt from the minimum account size requirement.

### **Method of analysis, investment strategies and risk of loss**

Securities and/or asset classes are initially screened electronically or by human research based on fundamental factors. In the case of individual stocks items such as; balance sheet strength, prospect for sales, cash flow and earnings stability or growth, relative size of company as compared to competitors, diversity and volatility of revenue stream, price to earnings, dividend yield are compared to other stocks in the same sector as well as to the market as a whole. The Adviser will attempt to purchase companies using human judgment which are considered fundamentally undervalued as determined by the above metrics. The methods to determine these characteristics will be but not limited to; listening to company conference calls or presentations, speaking to company representatives, visiting company assets or headquarters, reading annual and quarterly publications produced by the company, researching the company via publicly available information.

For clients who are considered 'accredited' or 'sophisticated' investors (generally those with greater than \$1.5 million in investable assets) private limited partnerships (also known as hedge funds) are offered as investment options. SAM vets the management and investment style of any recommended private limited partnership in an attempt to ensure it improves risk and return aspects of a client's overall portfolio.

In the case of sector or broad market mutual funds/ETF's, factors such as trading liquidity, past performance, total fund/ETF costs, and a fundamental analysis of the underlying economic factors in a manner similar to individual security selection is undertaken.

After looking at the fundamentals, if the security is considered a buy (or sell when exiting), a final technical analysis overlay is used to choose specific buy and sell points.

Risk / return profiles determined by the Client and Adviser will determine how much, if any of a security is purchased for a client's account(s).

The Adviser expects positions will usually be held for multiple months unless general market or individual security conditions warrant shorter holding periods.

Investing in securities involves risk of loss that *clients* should be prepared to bear. While SAM attempts to mitigate such risk, it is always present in investing and cannot be avoided. Beyond general market risks, (the entire equity or bond markets falling in price) those risks specific to SAM's style of investing include: Stocks, ETF's or sectors chosen for investment may fall dramatically, be subject to fraud or misrepresentation of facts, suffer dramatic external events such as wars, earthquakes, tsunamis, etc.

***Investing involves risk of loss and is not guaranteed to make money.  
You may lose money on your investments.***

#### **Disciplinary action**

Neither Strategic Asset Management LLC nor the principal Greg Merrill has been the subject of any legal or disciplinary events in the last 10 years.

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

SAM is not affiliated with any other broker-dealers. SAM is not a general/managing partner in any investments it may recommend for its clients. SAM does not receive any compensation from any entities it recommends or purchases for its clients.

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

SAM and its principals or employees may purchase securities for themselves that they recommended to its clients. To prevent conflicts of interest SAM uses a block account to ensure all clients and SAM receive the same price for the securities transactions that day. Under no circumstances will SAM purchase or sell securities for its own behalf before clients.

SAM will provide a copy of your code of ethics to any client or prospective client upon request

#### **Brokerage Practices**

SAM considers multiple factors when recommending a broker-dealer to clients. These factors include but are not limited to: Financial strength and solvency, other business arms of the broker-dealer which may induce biases or less than fiduciary standards, range of selection of offerings (mutual funds, bond and over the counter trading), trading commissions and total costs borne by the client, ability to make corrections after trade with the broker-dealer, ability to provide accurate and timely statements and reports. Currently SAM recommends clients use TD Ameritrade as the custodian for their accounts. SAM does not receive any compensation from TD Ameritrade for recommending them as a custodian.

SAM does not receive soft dollars from any brokers and it is not considered in selecting a broker-dealer. SAM and its principals pay the same commission, margin and all other rates that SAM's clients do and does not receive any preferential treatment from TD Ameritrade.

#### **Review of Accounts**

Client accounts are reviewed on an annual basis to ensure the risk and return parameters are in line with what client and SAM have determined.

Clients receive monthly brokerage statements from the custodian as well as quarterly reports from SAM. SAM's quarterly reports show current positions as well as gains and losses from the previous calendar year end.

### **Client Referrals and Other Compensation**

SAM does not compensate other individuals or entities for client referrals.

### **Custody**

Clients will receive monthly statements from the custodian. Clients should review these statements.

### **Investment Discretion**

Clients provide SAM with investment discretion on their accounts. This means the client authorizes SAM to place purchase and sale orders on behalf of the client without previous authorization from the client.

### **Voting Client Securities**

SAM does not vote for client securities unless specifically requested by clients. As of the date of this document's publication, SAM does not vote for any client's securities. Clients they may obtain a copy of SAM's proxy voting policies and procedures upon request.

Clients will receive their proxies and other solicitations directly from the custodian. Clients may contact SAM to discuss how SAM is voting in proxy matters.

### **Financial Information**

SAM has discretionary authority over client accounts and as such must disclose any financial conditions that may impair SAM's contractual commitments. SAM is a Limited Liability Corporation wholly separate from any other entities with a leverage ratio below one and must maintain a minimum net capital requirement of \$10,000 as required by Washington State regulators. SAM currently exceeds this minimum net capital requirement.

Neither SAM nor its principals have been subject to bankruptcy petition in the last 10 years.

### **Requirement for State Registered Advisers**

Gregory Merrill – Born 1970

BS Astronomy from University of Southern California 1992

Securities Licenses – Series 65 and 24

Previous employer was Admiralty Yacht Sales from 1981 to August 2008.

### **Other business activity**

Greg Merrill is general manager and minority equity investor in an office property partnership. Clients of SAM are not solicited for investments in this partnership.

Neither SAM nor Greg Merrill has been found liable in an arbitration claim over the last 10 years. Neither SAM nor Greg Merrill has been found liable in a civil, self-regulatory organization, or administrative proceeding over the last 10 years.