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FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

Name of Investment Adviser: Sarasota Capital Strategies, Inc.				
Address: (Number and Street) 460 South Tamiami Trail	(City) Osprey	(State) FL	(Zip Code) 34229	Area Code: Telephone number: (941) 918-2255

This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.

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(Schedules A B C D and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

1. A. Advisory Services and Fees. (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- (1) Provides investment supervisory services 99 %
- (2) Manages investment advisory accounts not involving investment supervisory services %
- (3) Furnishes investment advice through consultations not included in either service described above .. %
- (4) Issues periodicals about securities by subscription %
- (5) Issues special reports about securities not included in any service described above %
- (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities..... %
- (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities... 1 %
- (8) Provides a timing service %
- (9) Furnishes advice about securities in any manner not described above %

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? Yes No

C. Applicant offers investment advisory services for: (check all that apply)

- (1) A percentage of assets under management (4) Subscription fees
- (2) Hourly charges (5) Commissions
- (3) Fixed fees (not including subscription fees) (6) Other

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- A. Individuals E. Trusts, estates, or charitable organizations
- B. Banks or thrift institutions F. Corporations or business entities other than those listed above
- C. Investment companies G. Other (describe on Schedule F)
- D. Pension and profit sharing plans

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | <input checked="" type="checkbox"/> I. Options contracts on: |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input checked="" type="checkbox"/> (1) securities |
| <input checked="" type="checkbox"/> (3) foreign issuers | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | <input type="checkbox"/> J. Futures contracts on: |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| <input checked="" type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| <input type="checkbox"/> G. Investment company securities: | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> (2) variable annuities | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Charting | (4) <input checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input checked="" type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input checked="" type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ----- Yes No
(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a-
 - (1) broker-dealer
 - (2) investment company
 - (3) other investment adviser
 - (4) financial planning firm
 - (5) commodity pool operator, commodity trading adviser or futures commission merchant
 - (6) banking or thrift institution
 - (7) accounting firm
 - (8) law firm
 - (9) insurance company or agency
 - (10) pension consultant
 - (11) real estate broker or dealer
 - (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes No

(If yes, describe on Schedule F the partnerships and what they invest in.)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effectstransactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services and impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes No

(If yes, describe on Schedule F)

11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Accounts are periodically reviewed by a principal; generally every business day. Periodic reviews with clients are performed upon request from the client and are subject to normal scheduling procedures. Performance reporting is available upon request from the client.

B. Describe below the nature and frequency of regular reports to clients on their accounts.

Transaction notices are sent from the custodian when transactions occur. Monthly statements are provided from the custodian. Internet viewing of accounts is available for the client upon request.

12. Investment or Brokerage Discretion.

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:
- | | | |
|--|---|--|
| (1) securities to be bought or sold? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) broker or dealer to be used? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (4) commission rates paid? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

- B. Does applicant or a related person suggest brokers to clients? Yes No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. if the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|---|--|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet?..... Yes No

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Applicant: Sarasota Capital Strategies, Inc.	SEC File Number: 801- 125951	Date: September 28, 2007
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Sarasota Capital Strategies, Inc.	IRS Empl. Ident. No.: 46-0497104
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Item of Form (identify)	Answer
<u>1D</u>	<p>This Schedule F narrative provides clients with information regarding Sarasota Capital Strategies, Inc. ("SCS") and its advisory services that should be considered before becoming a client of SCS. This narrative also provides information about the qualifications and business practices of SCS.</p> <p>Additional information about SCS is available on the Internet at http://www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for SCS is <u>125951</u>.</p> <p>Sarasota Capital Strategies, Inc. provides its clients with investment advisory services ("Asset Management") on a discretionary basis, and non-investment related consulting.</p> <p>Sarasota Capital Strategies, Inc. is not affiliated with a Financial Industry Regulatory Authority - FINRA (formerly NYSE and NASD) member broker/dealer. SCS normally recommends that all accounts managed by SCS to be maintained either through broker-dealer/custodian TD Ameritrade Institutional Services, a division of TD Ameritrade Investor Services, Inc. Member NASD/SIPC and/or Rydex/National Financial Services, LLC ("Custodian") in an account established on a discretionary basis. SCS does not maintain custody of client assets.</p> <p>In the event the client desires Asset Management, an initial interview and data gathering questionnaire is undertaken to determine the client's individual needs, risk tolerance, objectives, net worth, income and other relevant factors. Clients will receive transaction confirmations as trades occur during the month and monthly statements from their brokerage account directly from the Custodian. The client will have a direct and beneficial interest in their securities, rather than an undivided interest in a pool of securities.</p> <p>Absolute Return Strategy SCS provides active Asset Management on proprietary trading strategies on a discretionary basis to clients seeking Absolute Return. The primary goal of Absolute Return is to deliver consistent returns in most market environments. Based on the initial client questionnaire and/or gathered information, SCS will generally recommend customized portfolio strategies and allocations in response to individual client criteria, objectives, risk tolerance as well as implied or directed portfolio restrictions encompassing but not limited to one or more broad categories: Income Generation, Capital Appreciation, and Dynamic Growth. Strategies are a result of proprietary technically driven scans and signals as well as research, experience, temperament along with fundamental and charting techniques.</p> <p>These strategies primarily use exchange traded funds (ETF's), closed end funds (CEF's), and open end mutual funds. These investments may represent domestic (U.S.), international and/or global, equity, fixed income, government securities, real estate investment trusts (REITs), options, and sectors. On atypical occasions SCS may provide advice on individual stocks, bonds, royalty trusts, and unit investment trusts.</p> <p>Income Generation This strategy focuses primarily on identifying attractive income opportunities through the use of dividends and interest. In addition to income, Its secondary objective is capturing capital appreciation.</p> <p>Capital Appreciation This strategy seeks capital appreciation by identifying underperforming and over-performing indexes and sectors both domestically and internationally. An asset allocation will primarily utilize ETF's, CEF's and specialized mutual funds both domestically and internationally.</p> <p>Dynamic Growth This strategy uses dynamic funds to magnify index and sector returns. This method of asset management is designed for the aggressive investor. SCS attempts to concentrate managed assets toward the best performing industries, market sectors and indexes with the use of internal fund leverage.</p> <p>In conjunction with the aforementioned strategies SCS may use on occasion risk management techniques for protective purposes. This is designed to reduce overall portfolio risk with the potential for additional return.</p>

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Applicant: Sarasota Capital Strategies, Inc.	SEC File Number: 801- 125951	Date: September 28, 2007
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Sarasota Capital Strategies, Inc.	IRS Empl. Ident. No.: 46-0497104
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Item of Form (identify)	Answer																
<u>1D cont</u>	<p>Fees for active Absolute Return Strategy Asset Management ("AM") are computed at a percentage of assets dependent upon the strategy(ies) utilized:</p> <p>The fee schedule for the Income Generation and Capital Appreciation Strategies are:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3">PORTFOLIO SIZE \$</th> <th>ANNUAL % ASSET MGT. "AM"</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">\$0</td> <td style="text-align: center;">TO</td> <td style="text-align: center;">\$999,999</td> <td style="text-align: center;">1.50%</td> </tr> <tr> <td style="text-align: center;">\$1,000,000</td> <td style="text-align: center;">TO</td> <td style="text-align: center;">\$2,999,999</td> <td style="text-align: center;">1.00%</td> </tr> <tr> <td style="text-align: center;">\$3,000,000</td> <td style="text-align: center;">&</td> <td style="text-align: center;">Above</td> <td style="text-align: center;">Negotiable</td> </tr> </tbody> </table> <p>The standard fee for the Dynamic Growth Strategy is:</p> <p>Maximum annual 2.50% of portfolio size value.</p> <p>SCS suggests an initial minimum account size of \$250,000. Lower minimums may be accepted at the discretion of the company.</p> <p>Asset Management The client will be required to enter into a formal <i>Discretionary Investment Management Agreement</i> prior to SCS providing Asset Management. This agreement describes the terms and conditions under which SCS shall manage the client's asset and provides client's Custodian account to be billed automatically for management fees, in accordance with the fee schedule. Usually, the total Asset Management fee charged by Sarasota Capital Strategies, Inc. is retained by Sarasota Capital Strategies, Inc., for services provided to the client. However, if SCS has hired the services of a solicitor, the fees may be shared as described in the solicitor's agreement, if applicable. These fees are for SCS advisory services only and do not include any transaction costs that can be incurred in a brokerage account.</p> <p>The initial quarterly fees are due upon the opening of the client account. The initial Asset Management fee will be prorated to cover the period of time from the opening date through the end of the calendar quarter. Thereafter, the Asset Management fee will be based on the market value of the account on the last business day of the preceding calendar quarter, paid in advance, and will cover the quarter in which billed. At the sole discretion of SCS, they may charge a lower Asset Management fee based upon various circumstances. (i.e., expected future assets, earnings, total aggregate accounts, negotiations with client, etc.)</p> <p>No fee adjustments will be made for partial withdrawals or for account appreciation or depreciation during a billing period. No refund of fees charged will be made if the account is closed within a billing period. SCS will not impose start-up, maintenance, closing, or penalty fees in connection with the account; however, the Custodian may impose such fees as their policies permit. Either party upon written notice may terminate the management contract at any time.</p> <p>Performance Based Fee Arrangements SCS offers on a limited basis performance based fee arrangements as permitted by applicable federal and state regulations, including SEC Rule 205-3 with qualified clients. "Qualified Clients" for the purpose of performance based fee arrangements are described as a Client that is a natural person or company who immediately after entering into this contract has at least \$750,000.00 under management of the Investment Advisor or is a person whose net worth at the time of this contract exceeds \$1,500,000.00 including assets held jointly with such person's spouse or is a qualified purchaser as defined in the Investment Company Act of 1940, §2(a)(51)(A) (15 U.S.C. 80a-2(51)(A)). Advisory clients choosing performance based fee arrangements understand that this fee may create the incentive for increased risk, and SCS may receive increased compensation in relation to unrealized appreciation as well as realized gains.</p> <p>Miscellaneous When effecting securities transactions for clients, SCS may place aggregate orders ("bundled orders") for securities to be purchased or sold on behalf of its clients. Following the execution of a bundled order, the order is allocated in such a manner as to assure each client the same average price per trade. This practice of bundling orders is generally beneficial to its clients in obtaining favorable executions. In the event that such bundled order transactions are partially executed or filled, or not available, SCS will allocate completed executions of transactions to client portfolios based on an equitable rotational system that considers a random assignment of client accounts under its management that at times may be dependent on portfolio cash levels and restrictions as well as risk tolerance, objectives, execution costs along with individual account minimum order size. Accounts held outside the Custodian will not have the opportunity to participate in bundled orders.</p>	PORTFOLIO SIZE \$			ANNUAL % ASSET MGT. "AM"	\$0	TO	\$999,999	1.50%	\$1,000,000	TO	\$2,999,999	1.00%	\$3,000,000	&	Above	Negotiable
PORTFOLIO SIZE \$			ANNUAL % ASSET MGT. "AM"														
\$0	TO	\$999,999	1.50%														
\$1,000,000	TO	\$2,999,999	1.00%														
\$3,000,000	&	Above	Negotiable														

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Applicant: Sarasota Capital Strategies, Inc.	SEC File Number: 801- 125951	Date: September 28, 2007
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Sarasota Capital Strategies, Inc.	IRS Empl. Ident. No.: 46-0497104
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Item of Form (identify)	Answer
<u>1D cont</u>	<p>Clients should be aware that, in addition to the investment advisory fees paid by the client in connection with Sarasota Capital Strategies, Inc. Asset Management services, each investment company (i.e. mutual funds, exchange traded funds, or closed-end funds) may also charge its own separate advisory fees, 12B-1 distribution charges and other fund expenses. Such fees, if any, may be found in the prospectus of the individual fund.</p> <p>Additionally, Custodian may charge a brokerage commission and/or transaction fees for effecting certain securities transactions as well as maintenance fees for account administration.</p> <p>The principals of Sarasota Capital Strategies, Inc. are licensed to recommend and sell insurance products (i.e. life, disability, long-term care insurance and fixed annuities) if appropriate. If such a product is purchased from a SCS related employee, compensation will be derived in the form of a commission from the individual insurance company and will not be subject to the above-described Asset Management fees.</p> <p>It is the responsibility of the client to promptly notify SCS if there are any current or anticipated changes in their financial situation, investment objective and risk tolerance. Clients may call in at any time during normal business hours to discuss directly with the investment advisor about the client's account, financial situation, or investment needs. Additionally, SCS shall not be required to verify any information received or omitted from the client or from the client's other professionals. The client retains absolute discretion over all investment implementation decisions and is free to accept or reject any recommendation made by SCS.</p>
<u>5</u>	<p>Sarasota Capital Strategies, Inc. requires all individuals who give advice on behalf of SCS to have a college education and 5 years experience related to investments, insurance and/or financial planning; and a history of honorable business ethics as the minimum standards for the professional staff.</p>
<u>6</u>	<p>Ian Arthur Naismith Born: April 15, 1963</p> <p>Educational Background: Austin College – B.A.'s Business Administration; Psychology; & Sociology, 1985</p> <p>Recent Business Background: Sarasota Capital Strategies, Inc., Principal, President, CCO, September 2002 – Present Naismith Capital Strategies, Inc., Principal, President, CCO, January 1997 – Present RTR, LLC, Managing Member, January 2006 – Present ETF Pros, Inc. Managing Member, December 2005 - Present First Security Financial Advisors, Inc., Registered Representative, July 1999 – October 2000 SunAmerica Securities, Registered Principal, November 1996 – July 1999 American Express Financial Advisors, Registered Representative, Financial Planner, August 1992 – November 1996</p> <p>Anthony Warren Welch, Sr. Born: September 27, 1960</p> <p>Educational Background: University of South Florida – B.A. Finance, 1990 College of Financial Planning – CFP, 1993 American College – ChFC, 2000</p> <p>Recent Business Background: Sarasota Capital Strategies, Inc., Principal, Vice President, September 2002 – Present Welch & Associates, Inc., President, CCO, January 2000 – Present RTR, LLC, Managing Member, January 2006 – Present ETF Pros, Inc. Managing Member, December 2005 - Present First Security Financial Advisors, Inc., Registered Principal, Municipal Bond Principal, April 1996 – December 2002 American Express Financial Advisors, Registered Representative, Senior Financial Advisor, January 1992 – April 1996</p>

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Applicant: Sarasota Capital Strategies, Inc.	SEC File Number: 801- 125951	Date: September 28, 2007
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Sarasota Capital Strategies, Inc.		IRS Empl. Ident. No.: 46-0497104
Item of Form (identify)	Answer	
<u>7(A) 7(B)</u>	<p>Associated persons of Sarasota Capital Strategies, Inc. are licensed insurance agents, and may be in the business of selling insurance products as a service to clients. The sale of these products will account for less than 1% of business operating time. Associated persons may receive compensation for the sale of such products. The client is under no obligation to purchase insurance products through SCS associated persons and is free to choose the sources through which to implement recommendations.</p> <p>Associated persons of Sarasota Capital Strategies, Inc. contribute intellectual property in the development of exchange traded funds with various fund providers. Approximate time spent on this activity account for less than 5% of business operating time.</p>	
<u>8C(3) 8C(9)</u>	<p>Ian A. Naismith owns and operates Naismith Capital Strategies, Inc. - Registered Investment Advisory firm. Anthony W. Welch owns and operates Welch & Associates, Inc. - Registered Investment Advisory firm.</p>	
<u>9E</u>	<p>No member of SCS, their immediate family and each person to whom such person(s) contribute support ("Member"), may effect any transactions in a security for themselves ("Proprietary Account") which is actively being transacted or recommended to clients, unless in accordance with SCS firm policies.</p> <ol style="list-style-type: none"> Each Member must first give priority on all purchases and sales of securities to clients, prior to the execution of transactions for their Proprietary Accounts, and personal trading must be conducted so as not to conflict with the interests of a client. No trading transactions for any Proprietary Accounts of any Member without prior approval of the CCO. No Member may engage in principal transactions between a client and Proprietary Account without first obtaining the prior written approval of the CCO and the consent of the client. No Member may execute a transaction in a security for a Proprietary Account if the member is aware or should be aware that an order for a client account for the same security, same way, remains unexecuted or Member is considering same way trades in the security for client accounts. <p>Section 204A of the Investment Advisers Act of 1940 SCS maintains and strictly enforces written policies reasonably designed to prevent the misuse of material non-public information.</p> <p>Code of Ethics SCS has adopted a Code of Ethics to establish a standard of professional conduct and responsibility for all members of SCS. It is established upon the fundamental principles of fiduciary duty to clients as well as honesty, openness, fairness, integrity, confidentiality, and professionalism. SCS and its members are prohibited from engaging in fraudulent, deceptive, or manipulative conduct. SCS and its members have an affirmative duty of utmost good faith to act solely in the best interest of its clients. A copy of SCS's Code of Ethics will be provided upon request to any requesting current or prospective client.</p>	
<u>10</u>	<p>Managed accounts generally are limited to an initial \$250,000 minimum for Absolute Return Asset Management. The minimum may be negotiated at the discretion of the firm.</p>	
<u>12(A1) (A2)</u>	<p>The client may elect to provide the company with discretionary authority over the account based on client goals, risk tolerance and overall financial objectives. The company would exercise discretion over the securities to be bought or sold and the amount of securities purchased or sold. Client accounts will generally be maintained with the Custodian.</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Applicant: Sarasota Capital Strategies, Inc.	SEC File Number: 801- 125951	Date: September 28, 2007
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Sarasota Capital Strategies, Inc.	IRS Empl. Ident. No.: 46-0497104
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Item of Form (identify)	Answer
<u>12(B)</u>	<p>Broker selection is based on a combination of quantitative and qualitative factors, which may include, but not limited to, transaction costs, quality of technology, service, responsiveness, execution, familiarity and financial strength. To insure the overall value to the client, the principals of SCS periodically review brokerage relationships and may suggest alternatives should they become appropriate for the client. Any research provided by broker dealers is available to all clients upon request.</p> <p>When undertaking an advisory relationship with SCS, some clients may instruct SCS to execute transactions through an already established broker or dealer. (Directed Brokerage) In the event that a client directs SCS to use a particular broker or dealer, it should be understood that under those circumstances SCS will not have the authority to negotiate commissions, obtain volume discounts and best execution may not be achieved. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to other clients.</p>
<u>13(B)</u>	<p>SCS may pay a referral fee to an unaffiliated or affiliated solicitor in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, for introducing a client to SCS. Any such referral introduced by a solicitor shall be disclosed (1) the nature of the solicitors relationship, and (2) shall be provided with a copy of SCS's written disclosure statement set forth on Part II of Form ADV, including Schedule F, together with (3) a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between SCS and the solicitor, including the compensation to be received by the solicitor from SCS. Any such referral fee shall be paid exclusively from SCS Asset Management fee, and shall not result in any additional charge to the client. Payments may be made under the terms of the contact as long as it remains in effect. Fees paid by introduced clients will not result in higher fees paid by other clients with similar sized accounts who were not introduced to the service.</p>

Complete amended pages in full, circle amended items and file with execution page (page 1).