Form ADV Part 2A - Firm Brochure
Item 1: Cover Page
March 2026

Strategic Portfolio Advisors, Inc.
194 Marina Drive, Suite 202
Long Beach, CA 90803

Firm Contact:
Todd Jones
President and Chief Compliance Officer

This brochure provides information about the qualifications and business practices of Strategic Portfolio Advisors, Inc.. If you have any questions about the contents of this brochure, please contact us by telephone at (562) 430-4872 or email at tjones@spadvisors.net. 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 Portfolio Advisors, Inc. also is available on the SECCs website at www.adviserinfo.sec.gov by searching CRD # 147194.

Please note that the use of the term "registered investment adviser" and description of Strategic Portfolio Advisors, Inc. and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firms associates who advise you for more information on the qualifications of our firm and our employees.

Item 2 : Material Changes

Strategic Portfolio Advisors, Inc. is required to advise you of any material changes to our Firm Brochure (" Brochure') from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure. We must state clearly that we are discussing only material changes since the last annual update of our Brochure, and we must provide the date of the last annual update of our Brochure.

Since our last annual amendment filing on 03/31/2025, we have no material changes to disclose.

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Item 4: Advisory Business

We specialize in the following types of services(Portfolio Management. All material conflicts of interest under CCR Section 260.238(k) are disclosed below regarding our firm, our representatives or our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice. To comply with CCR Section 260.238(j), we disclose that lower fees for comparable services may be available from other sources.

We are dedicated to providing individuals and other types of clients with a wide array of investment advisory services. Our firm is a corporation formed in the State of California. Our firm has been in business as an investment adviser since 2008 and is wholly owned by Todd Jones.

Description of the Types of Advisory Services We Offer

Portfolio Management:

We offer Portfolio Management services through our wrap fee program only. Please see our separate Wrap Fee Program Brochure for complete information regarding this advisory service.

Tailoring of Advisory Services

We offer individualized investment advice to clients utilizing our Portfolio Management service.

Fach client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account. Restrictions would be limited to our Portfolio Management service.

Participation in Wrap Fee Programs

We offer wrap fee programs as further described in Part 2A, Appendix 1 (the 'Wrap Fee Program Brochure') of our Brochure. Our wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk to lerance, etc. We do not manage wrap fee accounts in a different fashion than non- wrap fee accounts. As further described in our Wrap Fee Program Brochure, we receive a portion of the wrap fee for our services.

Regulatory Assets Under Management

As of December 31, 2025, our firm manages $103,815,073 on a discretionary basis and $0 on a non-discretionary basis.

Item : Fees & Compensation

We are required to describe our brokerage, custody, fees, and fund expenses so you will know how much you are charged and by whom for our advisory services provided to you. Our fees may be negotiable depending on a client's circumstance and is at the discretion of the firm's investment adviser representative.

How We Are Compensated for Our Advisory Services

Portfolio Management:

Please see our Wrap Fee Program Brochure for more information regarding the fees associated with this service.

Other Types of Fees & Expenses

Wrap fee clients will receive our Form ADV, Part 2A, Appendix 1 (the 'Wrap Fee Program Brochure''). Wrap fee clients will not incur transaction costs for trades. More information about this is disclosed in our separate Wrap Fee Program Brochure.

Termination & Refunds

We charge our advisory fees quarterly in advance. In the event that you wish to terminate our services, we will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to close out your account and process a pro- rata refund of unearned advisory fees.

Commissionable Securities Sales

We do not sell securities for a commission. In order to sell securities for a commission, we would need to have our associated persons registered with a broker- dealer. We have chosen not to do so.

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

We do not accept performance- based fees.

Item 7: Types of Clients & Account Requirements

We have the following types of clients:

- Individuals;
- High Net Worth Individuals; and
- Trusts, Estates or Charitable Organizations

Our requirements for opening and maintaining accounts or otherwise engaging us:

Strategic Portfolio Advisors, Inc. generally imposes a minimum of $150,000 to offer investment management services. However, this account minimum may be waived at the discretion of Strategic Portfolio Advisors, Inc. Strategic Portfolio Advisors, Inc. may allow accounts of members of the same household to be aggregated for purposes of meeting the minimum account size. Strategic Portfolio

Advisors, Inc. may allow such aggregation, for example, where Strategic Portfolio Advisors, Inc. services accounts on behalf of minor children of current clients, individual and joint accounts for a spouse, and other types of related accounts.

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

Methods of Analysis:

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Charting: In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict when how long the trend may last and when that trend might reverse.

Fundamental Analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis: We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly- managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis: In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Modern Portfolio Theory: This is a sophisticated investment decision approach that theoretically permits an investor to classify, estimate, and control both the kind and the amount of expected risk and return.

Investment Strategies we use:

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations. Typically we employ this strategy when we believe the securities to be currently undervalued, and/or we want exposure to a particular asset class over time, regardless of the current projection for this class.

Long- Term Purchases: When utilizing this strategy, we may purchase securities with the idea of holding them for a relatively long time (typically held for at least a year). A risk in a long- term purchase strategy is that by holding the security for this length of time, we may not take advantages of short- term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell. Typically we employ this

sub- strategy when we believe the securities to be well valued; and/or we want exposure to a particular asset class over time, regardless of the current projection for this class.

Short- Term Purchases: When utilizing this strategy, we may also purchase securities with the idea of selling them within a relatively short time (typically a year or less) . We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

Please note:
Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. I t is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

Description of Material, Significant or Unusual Risks

We generally invest client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high- grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve the highest return on our client's cash balances through relatively low- risk conservative investments. I n most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to portfolio management as applicable.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities & Affiliations

Our firm is not registered, nor does it have an application pending to register, as a broker- dealer, registered representative of a broker dealer, investment company or pooled investment vehicle, other investment adviser or financial planner, futures commission merchant, commodity pool operator, commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or a sponsor or syndicator of limited partnership, or an associated person of the foregoing entities. Our firm does not recommend or select other investment advisers for our clients.

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

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request.

Related persons of our firm may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Further, our related persons will refrain from buying or selling the same securities within 48 hours of buying or selling for our clients. If related persons' accounts are included in a block trade, our related persons will always trade personal accounts last.

Item 12 : Brokerage Practices

Selecting a Brokerage Firm

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors

- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation
- Quality of services

Our firm participates in the Charles Schwab & Co., Inc. Institutional program ('Schwab*), member FINRA/SIPC/NFA. Schwab offers independent investment advisers non-soft dollar services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some non-soft dollar benefits from Schwab through our participation in the program. Please see the disclosure under Item 1 4 of this Brochure.

Schwab may make certain research and brokerage services available at no additional cost to our firm all of which qualify for the safe harbor exemption defined in Section 2 8 (e) of the Securities Exchange Act of 1 93 4. These services may be directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided by Schwab may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision - making; and other products or services that provide lawful and appropriate assistance by Schwab to our firm in the performance of our investment decision- making responsibilities.

We do not use client brokerage commissions to obtain research or other products or services. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving these services, we may have an incentive to continue to use or expand the use of Schwab services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with Schwab and we have determined that the relationship is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

Charles Schwab charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no - load mutual funds, commissions are charged for debt securities transactions). Charles Schwab enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Charles Schwab commission rates are generally discounted from customary retail commission rates. The commission and transaction fees charged by Charles Schwab may be higher or lower than those charged by other custodians and broker- dealers.

Soft Dollars

Our firm does not receive soft dollars in excess of what is allowed by Section 2 8 (e) of the Securities Exchange Act of 1 93 4. The safe harbor research products and services obtained by our firm will generally be used to service all of our clients but not necessarily all at any one particular time.

Client Brokerage Commissions

We do not use client brokerage commissions to obtain research or other products or services. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

Procedures to Direct Client Transactions in Return for Soft Dollars

We do not direct client transactions to a particular broker-dealer in return for soft dollar benefits.

Brokerage for Client Referrals

Our firm does not receive brokerage for client referrals.

Directed Brokerage

Neither we nor any of our firm's related persons have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are effected. We routinely recommend that a client directs us to execute through a specified broker-dealer. Our firm recommends the use of Charles Schwab. Fach client will be required to establish their account(s) with Charles Schwab if not already done. Please note that not all advisers have this requirement.

Permissibility of Client-Directed Brokerage

In limited circumstances and at Strategic Portfolio Advisors' discretion, we allow clients to direct brokerage. However, we may be unable to achieve the most favorable execution of client transactions. Client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

Aggregation of Purchase or Sale

We perform investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13: Review of Accounts or Financial Plans

Client accounts are monitored on a continuous basis, with formal reviews conducted on at least an annual basis. Todd Jones, President and Chief Compliance Officer, will be responsible for overseeing all reviews. Triggering factors that may stimulate additional reviews include, but are not limited to, changes in economic conditions, changes in the Client's financial situation or investment objectives, or at the request of the Client. We provide Clients with quarterly performance reports and billing invoices and Clients will receive statements, at least quarterly, directly from their account custodian(s).

Item 14: Client Referrals & Other Compensation

Charles Schwab & Co, Inc - Institutional

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. We benefit from the products and services provided because the cost of these services would otherwise be borne directly by us, and this creates a conflict. You should consider these conflicts of interest when selecting a custodian. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 -Brokerage Practices).

Referral Fees

We pay referral fees (non-commission based) to independent solicitors (non-employees) for the referral of their clients to our firm in accordance with relevant state statutes and rules. Such referral fee represents a share of our investment advisory fee charged to our clients. This arrangement will not result in higher costs to you. In this regard, we maintain Solicitors Agreements in compliance with relevant state statutes and rules and applicable state and federal laws. All clients referred by Solicitors to our firm will be given full written disclosure describing the terms and fee arrangements between our firm and Solicitor(s).

Item 15: Custody

State Securities Bureaus generally take the position that any arrangement under which a registered investment adviser is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the adviser's instruction to the custodian is deemed to have custody of client funds and securities. As such, our firm has adopted the following safeguarding procedures:

a) Clients must provide our firm with written authorization permitting direct payment of advisory fees from their account(s) maintained by a custodian who is independent of our firm;
b) Our firm sends quarterly statements to the client showing the fee amount, the value of the assets upon which the fee is based, and the specific manner in which the fee is calculated as well as disclosing that it is the client's responsibility to verify the accuracy of fee calculation, and that the custodian does not determine its accuracy; and
c) The account custodian sends a statement to the client, at least quarterly, showing all account disbursements, including advisory fees.

Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

Third Party Money Movement:

The SEC issued a no-action letter ("Letter') with respect to the Rule 206(4)-2 ("Custody Rule') under the Investment Advisers Act of 1940 ("Advisers Act'). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of instruction ("SLOA') is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with Charles Schwab:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.

Item 16: Investment Discretion

Our clients need to sign a discretionary investment advisory agreement with our firm for the discretionary management of their account. If our firm manages any accounts on a non-discretionary basis, we will obtain client permission prior to effecting securities transactions in client accounts in accordance with CCR Section 260.237.2(f)(1).

Item 17: Voting Client Securities

We do not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Item 18: Financial Information

We are not required to provide financial information in this Brochure because:

- We do not require the prepayment of more than $500 in fees when services cannot be rendered within six months.
- We do not take custody of client funds or securities.

- We do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.
- We have never been the subject of a bankruptcy proceeding.

Item 19: Requirements for State-Registered Advisers

Todd Michael Jones
Year of Birth: 1961

Formal Education:

- Long Beach City College, Attended, 1980 to 1982.
- University of Southern California, B.A., International relations and Political Science, 1985.

Business Background for the Previous Five Years:

- Strategic Portfolio Advisors, Inc., President/Chief Investment Officer, 09/007 to Present.
- Private Equity Investments, Inc., Chief Investment Officer, 01/2002 to 04/2008.

Please see Item 10 of this Firm Brochure for any other business in which our firm is actively engaged. We do not charge performance-based fees. Our firm and management persons have not been involved in any arbitration awards, found liable in any civil, self- regulatory organization or administrative proceedings or have any relationships with issuers or securities apart from what is disclosed above.

Our firm does not have compensation arrangements connected with advisory services which are in addition to our advisory fees. Our management persons and representatives do not engage in other financial industry activities or affiliations. As a fiduciary, we always put our Client's interest above our own. Information regarding participation of interest in client transactions can be found in our Code of Ethics as well as Item 11 of this Brochure.

- Private Equity Investments, Inc., Chief Investment Officer, 01/2002 to 04/2008.

Please see Item 10 of this Firm Brochure for any other business in which our firm is actively engaged. We do not charge performance-based fees. Our firm and management persons have not been involved in any arbitration awards, found liable in any civil, self-regulatory organization or administrative proceedings or have any relationships with issuers or securities apart from what is disclosed above.

Our firm does not have compensation arrangements connected with advisory services which are in addition to our advisory fees. Our management persons and representatives do not engage in other financial industry activities or affiliations. As a fiduciary, we always put our Client's interest above our own. Information regarding participation of interest in client transactions can be found in our Code of Ethics as well as Item 11 of this Brochure.

Form ADV Part 2B – Brochure Supplement
Item 1: Cover Page
March 2026

Todd Jones
President, Chief Investment Officer & Chief Compliance Officer
CRD# 1173145

Strategic Portfolio Advisors, Inc.
194 Marina Drive, Suite 202
Long Beach, CA 90803

This brochure supplement provides information about Todd Jones that supplements our brochure. You should have received a copy of that brochure. Please contact Todd Jones, President and Chief Investment Officer, at (562) 430-4872 if you did not receive our firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Todd Jones is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Todd Michael Jones
Year of Birth: 1961

Formal Education:

- Long Beach City College, Attended, 1980 to 1982.
- University of Southern California, B.A., International Relations and Political Science, 1985.

Business Background for the Previous Five Years:

- Strategic Portfolio Advisors, Inc., President/Chief Investment Officer/Chief Compliance Officer, 09/2007 to Present.
- Private Equity Investments, Inc., Chief Investment Officer, 01/2002 to 04/2008.

Item 3. Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Todd Jones.

Item 4. Other Business Activities

Todd Jones does not have any outside business activities to report.

Item 5. Additional Compensation

Todd Jones does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6. Supervision

Todd Jones is the sole principal and Chief Investment Officer and as such has no internal supervision placed over him. He is however bound by our firm's Code of Ethics.

Item 7. Requirements for State-Registered Advisers

Todd Jones has not been involved in any arbitration claim alleging damages in excess of $2,500. Furthermore, he has neither been involved in nor found liable in any civil, self-regulatory organization, or administrative proceeding nor has been the subject of any bankruptcy petitions.