

# BROCHURE SUPPLEMENT

## Part 2B of Form ADV

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Sandeep Varma  
Personal CRD Number: 1926613

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This brochure supplement provides information about Sandeep Varma that supplements Sandeep Varma Wealth Strategies, LLC's, dba ATS Wealth Management's ("ATSWM" or the "Firm's") Brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer at (858) 643-5757 if you did not receive ATSWM's Brochure or if you have any questions about the contents of this supplement. Thank you.

Additional information about Sandeep Varma is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2: Educational Background and Business Experience**

Sandeep Varma

Year of birth: 1965

**Educational Background:**

Series 3, 1989; Series 7, 1990; Series 63, 1991

**Business Background:**

Sandeep Varma Wealth Strategies, LLC, dba ATS Wealth Management (July 1998 – Present), President

Advanced Marketing Strategies, Inc. (March 2001 – Present), President

FSC Securities, Inc. (October 2015 – Present) Investment Adviser Representative and Registered Representative (conducted through branch office and dba of ATS Advanced Trustee Strategies)

LPL Financial, LLC/ Linsco/Private Ledger Corp. (March 1995 – October 2015), Investment Adviser Representative and Registered Representative

**Item 3: Disciplinary Information**

As your investment adviser representative, Sandeep Varma (“Mr. Varma”) is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of him.

In March 1999, Mr. Varma’s investment adviser certificate was revoked by the State of California Department of Business Oversight (“DBO”) for his alleged failure to pay the renewal fee in a timely fashion. This was due to non-receipt of the renewal paperwork. Registration of the subject investment adviser was reinstated in September 1999.

In January 2018, Mr. Varma entered into a Letter of Acceptance, Waiver and Consent (No. 2014040164801) (the “AWC”). Without admitting or denying FINRA’s findings, Mr. Varma submitted to the AWC for the purpose of proposing a settlement of his alleged rule violation. Specifically, Mr. Varma consented to sanctions and to an entry of findings resulting from his use of a seminar slide presentation during the period of September 2013 through February 2014 which promoted a complex estate planning strategy involving the use of a charitable remainder trust (CRT) that allegedly failed to comply with FINRA Rule 2210(d)(1). Mr. Varma conducted four (4) seminar presentations, attended by approximately 70 prospective clients, using the seminar presentation which FINRA found failed to provide a sound basis for evaluating the CRT strategy, failed to provide a balanced discussion of the risks and rewards associated with the strategy, and contained claims that were exaggerated, promissory, and/or misleading. As a result, Mr. Varma violated FINRA Rule 2210 (d)(1)(A) and (B) as well as FINRA Rule 2010. As part of the AWC, Mr. Varma consented to the imposition of a \$15,000 fine and a 10-business day suspension from associating with any FINRA member firm in any capacity. A complete copy of the AWC is available [https://www.finra.org/sites/default/files/fda\\_documents/2014040164801%20Sandeep%20Varma%20CRD%201926613%20AWC%20sl.pdf](https://www.finra.org/sites/default/files/fda_documents/2014040164801%20Sandeep%20Varma%20CRD%201926613%20AWC%20sl.pdf); or by calling the Firm’s Chief Compliance Officer, Mindi Jellison, at (858) 643-5757.

**Item 4: Other Business Activities**

In addition to his activities at ATSWM, Mr. Varma is a registered representative of FSC Securities, Inc. (“FSC”). FSC is an SEC registered broker-dealer and a member of the Financial Industry National Regulatory Authority (“FINRA”). In this capacity, Mr. Varma may receive a usual and customary commission for implementing financial planning recommendations and/or placing clients in investment products sold through FSC. Many such products have fixed commissions as they are sold through a prospectus. In this capacity, Mr. Varma spends approximately forty (40) hours per month. ATSWM and FSC are unaffiliated companies.

Mr. Varma is also an Investment Adviser Representative (“IAR”) of FSC’s registered investment advisory firm. In this capacity, Mr. Varma may make products and services of FSC available to clients pursuant to a separate engagement with FSC. Mr. Varma will receive usual and customary advisory fees from FSC in his capacities as IARs. In this capacity, Mr. Varma spends approximately forty (40) hours per month.

It should be noted that when performing activities on behalf of FSC, Mr. Varma performs them through Advanced Trustee Strategies, Inc., which serves as a branch office of and dba for FSC.

Mr. Varma (California life, accident and health, variable life and variable annuities license # 0790710) is also a licensed insurance agent with various insurance agencies. As a licensed insurance agent, Mr. Varma may recommend to clients certain insurance products sold through these various insurance companies. If a client elects to purchase such an insurance product, Mr. Varma may receive a usual and customary commission for doing so. In this capacity, Mr. Varma spends less than 1 hour per month.

To the extent that Mr. Varma recommends the purchase of securities, insurance or other investment products where he may receive commissions for doing so, a conflict of interest exists because Mr. Varma receives compensation should the clients elect to follow his recommendations, even if such a recommendation is based on the best interest of the clients and their needs. Clients are not obligated to implement recommended transactions through any ATSWM representative or any particular broker-dealer or insurance agency. Clients have the option to purchase any recommended products or services through brokers or agents other than ATSWM. Further, ATSWM has adopted certain procedures designed to mitigate the effects of these conflicts. For example, as part of ATSWM's fiduciary duty to clients, Mr. Varma will endeavor at all times to put the interests of the clients first, and recommendations will only be made to the extent that they are reasonably believed to be suitable and in the best interests of the client. Additionally, material conflicts presented by these practices are disclosed to clients at the time of entering into any new advisory, brokerage or consultative arrangement.

Mr. Varma also serves as the President to Advanced Marketing Strategies, Inc., a business created for the creation and dissemination of financial market related publications. Such publications include newsletters, magazines and books focusing on the financial market. Mr. Varma's activities with Advanced Marketing Strategies do not constitute a substantial (*i.e.*, more than 10%) of his time or income.

**Item 5: Additional Compensation**

As a member and investment adviser representative of ATSWM, Mr. Varma may be entitled to an end of year discretionary bonus based on overall firm profitability. As mentioned in Item 4, above, Mr. Varma also receives commissions for the sale of certain investment and insurance products to clients. As mentioned above, these multiple roles and additional compensation received create conflicts of interest even if such recommendation is based on the best interests of the clients and their needs. ATSWM has adopted certain procedures to mitigate the effect of these conflicts, and the Firm will endeavor at all times to put the interests of the clients first, and recommendations will only be made to the extent that they are reasonably believed to be suitable and in the best interests of the client.

**Item 6: Supervision**

Mr. Varma is the sole owner of ATSWM. As such, Mr. Varma is responsible for all advice provided to clients. Mr. Steven Musser is responsible for supervising and monitoring Mr. Varma's activities on a regular basis. Mr. Musser may be contacted at (858) 643-5757 or at [steve.m@atsfinancial.com](mailto:steve.m@atsfinancial.com).

**Item 7: Requirements for State Registered Advisers**

**A. Additional disciplinary information**

Please see Item 3 above for disciplinary information pertaining to Mr. Varma.

**B. Bankruptcy information**

Mr. Varma has not been the subject of any bankruptcy proceedings.