



**SETTANNI**  
FINANCIAL

**Sutton Place Investors LLC  
dba Settanni Financial**

**Form ADV Part 2A – Disclosure Brochure**

**Effective: April 12, 2024**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Sutton Place Investors LLC dba Settanni Financial (“Settanni Financial” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (914) 767-0974.

Settanni Financial is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the 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 Settanni Financial to assist you in determining whether to retain the Advisor.

Additional information about Settanni Financial and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or our CRD# 298989.

**Sutton Place Investors LLC**  
**6 Sutton Place, Katonah, NY 10536**  
**Phone: (914) 767-0974 \* Fax: (914) 617-1517**  
<http://www.settannifinancial.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 the Advisory Persons of Settanni Financial. For convenience, we have combined these documents into a single disclosure document.

Settanni Financial believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Settanni Financial 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

The following material change has been made to this Disclosure Brochure since the last annual filing and distribution to Clients:

- Settanni Financial has amended Item 5 regarding its fixed annual consulting fee. Please see this item for additional information.
- Settanni Financial has amended Items 6 and 8.B to reflect that performance-based fees are no longer charged.
- As a result of the TD Ameritrade and Charles Schwab merger, the Advisor now recommends the Client custody their assets at Charles Schwab & Co., Inc. Please see Item 12 and Item 14 for additional details
- The Advisor has amended Item 10 to disclose new Financial Industry Affiliations. Please see Item 10 for additional details.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

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](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or our CRD# 298989. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (914) 767-0974.

---

#### **Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

## Item 3 – Table of Contents

---

<b>Item 1 – Cover Page</b>	<b>1</b>
<b>Item 2 – Material Changes</b>	<b>2</b>
<b>Item 3 – Table of Contents</b>	<b>3</b>
<b>Item 4 – Advisory Services</b>	<b>4</b>
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	6
D. Wrap Fee Programs	6
E. Assets Under Management	6
<b>Item 5 – Fees and Compensation</b>	<b>6</b>
A. Fees for Advisory Services	7
B. Fee Billing	8
C. Other Fees and Expenses	8
D. Advance Payment of Fees and Termination	9
E. Compensation for Sales of Securities	9
<b>Item 6 – Performance-Based Fees and Side-By-Side Management</b>	<b>10</b>
<b>Item 7 – Types of Clients</b>	<b>10</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>10</b>
A. Methods of Analysis	10
B. Risk of Loss	11
<b>Item 9 – Disciplinary Information</b>	<b>12</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations</b>	<b>12</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>13</b>
A. Code of Ethics	13
B. Personal Trading with Material Interest	13
C. Personal Trading in Same Securities as Clients	14
D. Personal Trading at Same Time as Client	14
<b>Item 12 – Brokerage Practices</b>	<b>14</b>
A. Recommendation of Custodian[s]	14
B. Aggregating and Allocating Trades	15
<b>Item 13 – Review of Accounts</b>	<b>15</b>
A. Frequency of Reviews	15
B. Causes for Reviews	15
C. Review Reports	15
<b>Item 14 – Client Referrals and Other Compensation</b>	<b>15</b>
A. Compensation Received by Settanni Financial	15
B. Compensation for Client Referrals	16
<b>Item 15 – Custody</b>	<b>16</b>
<b>Item 16 – Investment Discretion</b>	<b>17</b>
<b>Item 17 – Voting Client Securities</b>	<b>17</b>
<b>Item 18 – Financial Information</b>	<b>17</b>
<b>Form ADV Part 2B – Brochure Supplement[s]</b>	<b>18</b>
<b>Privacy Policy</b>	<b>29</b>

## Item 4 – Advisory Services

---

### A. Firm Information

Sutton Place Investors LLC dba Settanni Financial (“Settanni Financial” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of New York. Settanni Financial was founded in September 2018, and is owned and operated by Donato Settanni, CPA (Chief Executive Officer) and David V. Settanni (Chief Financial Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Settanni Financial.

### B. Advisory Services Offered

Settanni Financial offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, businesses, institutions and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the 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. Settanni Financials’ fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

The Advisor’s investment process starts with our first Client meeting. Advisory Persons of Settanni Financial will work closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. The Advisor will evaluate the Client’s ability and willingness to assume risk based on their current assets, family structure, future needs, and current and future income streams. Clients that engage the Advisor for investment management services will go through the Advisor’s risk tolerance questionnaire and review process to develop an asset allocation and investment portfolio that seeks to achieve the Client’s goals and objectives. Settanni Financial will typically construct a Client’s investment portfolio utilizing diversified mutual funds, exchange-traded funds (“ETFs”), and individual equity and fixed income securities. The Advisor may also utilize options contracts, private equity and other types of investments, as appropriate, to meet the needs of particular Clients. The Advisor may also retain certain types of investments based on a Client’s legacy portfolio construction to minimize tax implications.

Once the portfolio is established, Settanni Financial will provide continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Clients may also engage the Advisor for its wealth management services (investment management, financial planning, taxes and estate planning).

Settanni Financial’s investment strategies are primarily long-term focused, but 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. Settanni Financial 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 acceptance by the Advisor.

Settanni Financial evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Settanni Financial may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Settanni Financial may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Settanni Financial may recommend 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 the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

All Client assets will be managed within the designated account(s) at the Custodian, pursuant to the terms of the agreement, please see Item 12 – Brokerage Practices.

*Use of Independent Managers* - Settanni Financial will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client's investment portfolio, based on the Client's needs and objectives. In certain instances, the Client may be required to authorize and enter into an investment management agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

#### Retirement Plan Advisory Services

Settanni Financial provides advisory services on behalf of retirement plans (each a “Plan”) and the company (the “Plan Sponsor”). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant and Education Tracking
- Investment Policy Statement (“IPS”) Design and Monitoring
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

These services are provided by Settanni Financial serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). The Advisor may serve as either a 3(21) Fiduciary (non-discretionary) or a 3(38) Fiduciary, assuming investment discretion over Plan assets. In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Settanni Financial's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### Financial Planning Services

Settanni Financial will typically provide a variety of financial planning and consulting services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, and objectives.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning,

estate planning, tax management, personal savings, education savings, insurance needs and other areas of a Client's financial situation.

A financial plan developed for, or 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 example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Settanni Financial may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or 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 implement the transaction through the Advisor.

### **C. Client Account Management**

Prior to engaging Settanni Financial 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 Strategy – Settanni Financial, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Settanni Financial will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Settanni Financial will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Settanni Financial will provide investment management and ongoing oversight of the Client's investment portfolio.

### **D. Wrap Fee Programs**

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

### **E. Assets Under Management**

As of December 31, 2023, Settanni Financial manages \$230,835,315 in Client assets, \$227,677,337 of which are managed on a discretionary basis and \$3,157,978 on a non-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 engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

## **A. Fees for Advisory Services**

### Investment Management Services

The Client will pay the Advisor a quarterly investment advisory fee, billed at the end of each quarter, based on the average daily balance of portfolio assets under management in the Account[s] during the quarter. However, investment advisory fees in the first month of service are billed in arrears based on the average daily balance of the assets under management for the prorated period from the inception date of the account[s] to the end of the first quarter. Investment advisory fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Maximum Annual Rate (%)</b>
Up to \$500,000	2.00%
\$500,001 to \$1,000,000	1.75%
\$1,000,001 to \$3,000,000	1.50%
\$3,000,001 to \$10,000,000	1.25%
\$10,000,001 to \$50,000,000	1.00%
\$50,000,001 to \$100,000,000	0.75%

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. 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 the Advisor. All securities held in accounts managed by Settanni Financial will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuations. If the Client engages the Advisor for its wealth management services, the Client will pay a single fee for investment management, financial planning, taxes and estate planning.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. The Advisor will allocate a portion of the advisory fee collected to the Independent Manager pursuant to the terms of the executed agreement between the Advisor and the Independent Manager.

### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 2.00%, billed either monthly in arrears using average daily balance or quarterly in arrears using the quarter end account value pursuant to the terms of the agreement. Retirement plan fees are based on the market value of assets under management at the end of the calendar quarter or month as determined by the agreement. Fees charged on retirement plan advisory accounts may be billed in advance or arrears based on the agreement.

### Financial Planning Services

Settanni Financial offers financial planning services either on an hourly basis or a fixed annual consulting engagement fee. Hourly engagements range up to \$500 per hour. Fixed annual consulting fee engagements range up to \$120,000 per year, billed at the end of each month, based on the scope and time involved for the services to be provided. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services. If the Client engages the Advisor for its wealth management services, the Client will pay a single fee for investment management, financial planning, taxes and estate planning.

---

#### **Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>



## **B. Fee Billing**

### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate 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 end of each quarter. Fees are calculated based on the average daily balance of portfolio assets under management in the Account[s] during the quarter times the quarterly rate. Clients engaged by the Advisor prior to March 1, 2019, may be billed in advance of each calendar quarter and are calculated by applying the quarterly rate (annual rate divided by 365) to the total assets under management with Settanni Financial for the applicable quarter.

For Clients engaging for services prior to March 1, 2019, investment advisory fees are calculated by the Advisor or its delegate 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 beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 365) to the total assets under management with Settanni Financial for the applicable quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory 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 Settanni Financial to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory 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 advisory fees to be deducted by Settanni Financial to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees include Settanni Financial's investment advisory fee (as noted above), investment management fees charged by the Independent Manager[s] is collected through the internal expenses of the underlying investments.

### Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### Financial Planning Services

Hourly Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s]. Fixed annual consulting fee engagements are billed monthly in arrears, pursuant to the terms of the Consulting Agreement.

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Settanni Financial, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all securities execution and custody fees charged by the Custodian, if applicable. The Advisor's recommended custodians do not charge securities transaction fees for ETF and equity trades in Client accounts, but does charge for certain mutual funds and other types of investments. The fees charged by Settanni Financial are separate and distinct from these custody and execution fees.

In addition, all fees paid to Settanni Financial 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

---

**Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536

Phone: (914) 767-0974 \* Fax: (914) 617-1517

<http://www.settannifinancial.com>



for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Settanni Financial, but would not receive the services provided by Settanni Financial which are designed, among other things, to assist the Client in determining which products or services are most appropriate for 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 Settanni Financial to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information. Additionally, as noted above, the Advisor will select share classes which do not have trading costs, but do have higher internal expense ratios than institutional share classes. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Investment Management Services

Clients are typically billed at the end of each calendar quarter. However, certain legacy Clients may be billed in advance for its investment advisory services. Either party may terminate the investment advisory agreement, 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. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

##### Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest, the Advisor will have the discretion to terminate the relationship with the Independent Manager. The terms for termination are set forth in the respective agreements between the Advisor and the Independent Managers.

##### Retirement Plan Advisory Services

Settanni Financial is compensated for its retirement plan advisory services at the end of each billing period. Either party may terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. Upon termination, the Client shall be responsible for retirement plan advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferrable without the Client's written consent.

##### Financial Planning Services

Settanni Financial may require an advance deposit as described in Item 5.A. above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning 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. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

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

Certain Advisory Persons are also registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In one's separate capacity as a registered representative of PKS, the Advisory Person will implement securities transactions under PKS and not through Settanni Financial. In such instances, the Advisory Person will receive commission-based compensation in connection

with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by the Advisory Person in one's capacity as a registered representative is separate from and in addition to Settanni Financial's advisory fees. Please see Item 10.

Certain Advisory Persons are also be licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to Client's Insurance commissions earned by an Advisory Person are separate and in addition to advisory fees. This practice presents a conflict of interest because a person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

---

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

---

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

Settanni Financial 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**

---

Settanni Financial offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, businesses, institutions, and retirement plans. Settanni Financial has a minimum relationship size of \$1,000,000. This minimum can be waived at the sole discretion of Settanni Financial.

---

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

---

### **A. Methods of Analysis**

Settanni Financial primarily employs fundamental and cyclical analysis methods in developing investment strategies for its Clients. Research and analysis from Settanni Financial are 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 consist generally of 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.

*Cyclical analysis* is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that Settanni Financial is recommending. The risks with cyclical analysis are similar to those of technical analysis.

As noted above, Settanni Financial generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Settanni Financial 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, Settanni Financial may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals 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. Settanni Financial 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.

While the methods of analysis help 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 these methods of 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.

Each Client engagement will entail a review of the Client's investment goals, 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[s]. 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 Advisor's investment approach.

### 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 ETFs 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 have 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

The performance of 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.

### Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

---

#### **Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

#### 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 Settanni Financial or any of its Supervised Persons.** Settanni Financial values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisors firm name or CRD# 298989.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

---

##### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

##### Broker-Dealer Affiliation

As noted in Item 5, certain Advisory Persons are also registered representatives of PKS. PKS is a registered broker-dealer, member FINRA, SIPC. In one's separate capacity as a registered representative, the Advisory Person will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisory Person. Neither the Advisor nor the Advisory Person will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative.

##### Insurance Agency Affiliations

As noted in Item 5. above, certain Advisory Persons are also licensed insurance professionals. Implementation of insurance recommendations are separate and apart from an Advisory Person's role with the Advisor. As an insurance professional, an Advisory Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. An Advisory Person is not required to offer the products or any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by an Advisory Person or the Advisor.

##### Tax and Accounting Services

Advisory Persons also provide tax and accounting services through Don Settanni, CPA, PLLC, a tax and accounting firm under common control with the Advisor. The accounting firm will offer its services to Clients of the Advisor and clients of the accounting firm will be offered the advisory services of the Advisor as appropriate. Clients are not required to utilize the services provided by Don Settanni, CPA, PLLC.

##### DVS Capital Partners GP, LLC & DVS Capital Partners LP, LLC

The Advisor is affiliated and under common control and ownership with DVS Capital Partners GP, LLC ("DVS Capital Partners GP"), due to David Settanni's position as the Owner and Principal of DVS Capital Partners GP. DVS Capital Partners, GP serves as the General Partner to DVS Capital Partners LP, LLC an exempt-from-registration pooled investment vehicle created for the purpose of providing investors with returns that are not

---

##### **Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

correlated with broader equity markets (the “Fund”). The General Partner offers to third-party investors and Clients of Settanni Financial (collectively “Investors”) direct access to the Fund.

Due to the affiliation between the General Partner and Settanni Financial, management persons have a financial incentive to recommend that Clients invest in the Fund. To address this conflict, Settanni Financial will not receive any investment advisory fees on assets invested by Clients into the fund. Prior to recommending an investment into the Fund, Settanni Financial will conduct appropriate due diligence to ensure the recommendation to a Client to invest aligns with the Client’s investment needs and objectives. In addition, Settanni Financial will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation as it relates to the Fund. Finally, there is no requirement for Settanni Financial to recommend the Fund to Clients, nor are Clients obligated to invest in the Fund.

#### DVS Capital Management, LLC

The Advisor is also under common control and ownership with DVS Capital Management, LLC (“DVSCM”) through David Settanni, which serves as an exempt-from-registration investment manager to DVS Capital Partners LP, LLC (the “Fund”) an exempt-from-registration pooled investment vehicle.

The service provided by DVSCM is detailed in the offering document of the Fund, which include as applicable, operating agreements, private placement memorandum and/or term sheets, subscription agreements, separate disclosure documents, and all amendments thereto (“Offering Document”). DVSCM manages the Fund based on the investment objectives, policies and guidelines as set forth in the respective Offering Document and not in accordance with the individual needs or objectives of any particular investor therein. Each prospective investor interested in investing in a Fund is required to complete a subscription agreement in which the prospective investor attests as to whether or not such prospective investor meets the qualifications to invest in the Fund and further acknowledges and accepts the various risk factors associated with such an investment.

In general, investors in the Funds are not permitted to impose restrictions or limitations. The Advisor will recommend that certain Clients invest in the Fund. The recommendation to invest in the Fund poses a conflict between the interests of the Advisor and the interests of the Client, as the Advisor is incentivized to increase the amount of assets in the Fund, not already managed by DVSCM, in order to increase the revenue generated to management persons of the Advisor. This conflict is mitigated as Clients will only pay the asset-based fee as described in the Offering Document. Settanni Financial will not receive investment advisory fees on assets invested in the Fund. Clients of the Advisor are under no obligation to invest in the Fund.

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

---

#### **A. Code of Ethics**

Settanni Financial has implemented a Code of Ethics (the “Code”) that defines the Advisors’s fiduciary commitment to each Client. This Code applies to all persons associated with Settanni Financial (“Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor’s duties to the Client. Settanni Financial and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Settanni Financial’s 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 address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (914) 767-0974.

#### **B. Personal Trading with Material Interest**

Settanni Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Settanni Financial 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. Settanni Financial does not have a material interest in any securities traded in Client accounts.



### C. Personal Trading in Same Securities as Clients

Settanni Financial allows 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 are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can 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 Settanni Financial requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

### D. Personal Trading at Same Time as Client

While Settanni Financial allows 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 afterward. **At no time will Settanni Financial, or any Supervised Person of Settanni Financial, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

---

### A. Recommendation of Custodian[s]

Settanni Financial 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 Settanni Financial to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Settanni Financial does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Settanni Financial does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] 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 Settanni Financial. As Advisory Person of Settanni Financial are also registered representatives of PKS, the Advisor is limited in the Custodians it can utilize and must only use a Custodian approved by PKS.

Settanni Financial 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". Settanni Financial maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab (Please see Item 14 below.)

Settanni Financial may also recommend that Clients establish their account[s] at Interactive Brokers LLC ("Interactive Brokers"), a FINRA-registered broker-dealer and member SIPC. Interactive Brokers will serve as the Client's "qualified custodian". Settanni Financial maintains an institutional relationship with Interactive Brokers, whereby the Advisor receives economic benefits from Interactive Brokers. Please see Item 14 below.

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 a broker/dealer/custodian in exchange for research and other services. **Settanni Financial does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - Settanni Financial 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 Settanni Financial 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]). Settanni Financial 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 designated Custodian. The Advisor may not be able to aggregate orders to reduce transaction costs in a Client directed brokerage account.

## **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 the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Settanni Financial will execute its transactions through the Custodian as authorized by the Client.

Settanni Financial may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. 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 any particular Clients’ accounts.

## **Item 13 – Review of Accounts**

---

### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Principals of Settanni Financial. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client’s request. 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 Settanni Financial if changes occur in the Client’s personal financial situation that might adversely affect the Client’s 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 Settanni Financial**

#### Participation in Institutional Advisor Platform



Settanni Financial has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like Settanni Financial. As a registered investment advisor participating on the Schwab Advisor Services platform, Settanni Financial 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 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 to Settanni Financial 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. Settanni Financial believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

The Advisor’s receipt of Additional Services does not diminish the Advisor’s duty to act in the best interest of its clients, including to seek best execution of trades for client accounts.

Settanni Financial has established an institutional relationship with Interactive Brokers to assist the Advisor in managing Client account[s]. Access to the Interactive Brokers platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Interactive Brokers. The software and related system support may benefit the Advisor, but not its Clients directly. 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 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.

## **B. Compensation for Client Referrals**

Settanni Financial does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

## **Item 15 – Custody**

---

All Clients must maintain their accounts with a “qualified custodian,” as described in Item 12 – Brokerage Practices. Settanni Financial accepts custody of a Client’s funds or securities, through the deduction of management fees from the Client’s account[s] at the, and in certain situations where Supervised Persons of Settanni Financial serve as trustee for certain Client relationships. Clients should review statements provided by the Custodian and compare to any reports provided by Settanni Financial to ensure accuracy, as the Custodian does not perform this review.

#### Surprise Independent Examination

As Settanni Financial is deemed to have custody over certain Client accounts and/or securities as part of their access to Client login credentials, pursuant to securities regulations the Advisor is required to engage an independent accounting firm to perform an annual surprise examination of those assets and accounts over which Settanni Financial maintains custody. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website (<http://adviserinfo.sec.gov>).

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

#### **Item 16 – Investment Discretion**

---

Settanni Financial 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 Settanni Financial. 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 Settanni Financial will be in accordance with each Client's investment objectives and goals.

#### **Item 17 – Voting Client Securities**

---

Settanni Financial 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 Settanni Financial, nor its management, have any adverse financial situations that would reasonably impair the ability of Settanni Financial to meet all obligations to its Clients. Neither Settanni Financial, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. Settanni Financial is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

---

#### **Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Donato Settanni, CPA  
Chief Executive Officer**

**Effective: 12, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Donato Settanni, CPA (CRD# 2775800) in addition to the information contained in the Sutton Place Investors LLC dba Settanni Financial (“Settanni Financial” or the “Advisor”, CRD# 298989) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Settanni Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (914) 767-0974.

Additional information about Mr. Settanni is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2775800.

---

**Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

---

## Item 2 – Educational Background and Business Experience

---

Donato Settanni, CPA, born in 1955, is dedicated to advising Clients of Settanni Financial as the Chief Executive Officer. Mr. Settanni also earned a Bachelor of Science in Accounting from Manhattan College in 1977. Additional information regarding Mr. Settanni's employment history is included below.

### Employment History:

Chief Executive Officer, Sutton Place Investors LLC dba Settanni Financial	10/2018 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	10/2018 to Present
Owner, Don Settanni, CPA, PLLC	04/1986 to Present
Investment Advisor Representative, Cetera Investment Advisers LLC d/b/a Settanni Financial	06/2006 to 11/2018
Registered Representative, Cetera Financial Specialists LLC	10/2005 to 11/2018
Registered Representative, C.J.M. Planning Corp.	07/1996 to 10/2005

### Certified Public Accountant ("CPA")

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

---

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Mr. Settanni.*** Mr. Settanni 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. Settanni.

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. Settanni.***

However, we do encourage you to independently view the background of Mr. Settanni on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2775800.

---

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Settanni is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Mr. Settanni's separate capacity as a registered representative, Mr. Settanni will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr.

---

Sutton Place Investors LLC  
6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

Settanni. Neither the Advisor nor Mr. Settanni will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Settanni's separate capacity as a registered representative.

#### Insurance Agency Affiliations

Mr. Settanni is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Settanni's role with Settanni Financial. As an insurance professional, Mr. Settanni will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Settanni is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Settanni or the Advisor.

#### Tax and Accounting Services

Mr. Settanni also serves as the owner of Don Settanni, CPA, PLLC, a tax and accounting firm under common control with the Advisor. The accounting firm will provide its services to Clients of the Advisor and clients of the accounting firm may also be offered the advisory services of the Advisor. Clients are not required to utilize the services provided by Don Settanni, CPA, PLLC.

### **Item 5 – Additional Compensation**

---

Mr. Settanni has additional business activities that are detailed in Item 4 above.

### **Item 6 – Supervision**

---

Mr. Settanni serves as the Chief Executive Officer of Settanni Financial and is supervised by Vito Collacuro, the Chief Compliance Officer. Vito Collacuro can be reached at (914) 767-0974.

Settanni Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Settanni Financial. Further, Settanni Financial is subject to regulatory oversight by various agencies. These agencies require registration by Settanni Financial and its Supervised Persons. As a registered entity, Settanni Financial is subject to examinations by regulators, which may be announced or unannounced. Settanni Financial 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.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**David V. Settanni CFA®**  
**Chief Financial Officer**

**Effective: April 12, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of David V. Settanni (CRD# 5559889) in addition to the information contained in the Sutton Place Investors LLC dba Settanni Financial (“Settanni Financial” or the “Advisor”, CRD# 298989) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Settanni Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (914) 767-0974.

Additional information about Mr. Settanni is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5559889.

## Item 2 – Educational Background and Business Experience

---

David V. Settanni, born in 1986, is dedicated to advising Clients of Settanni Financial as its Chief Financial Officer. Mr. Settanni also earned a Bachelor of Science in Economics from the State University of New York College at Purchase in 2009. Additional information regarding Mr. Settanni's employment history is included below.

### Employment History:

Chief Financial Officer, Sutton Place Investors LLC dba Settanni Financial	10/2018 to Present
Owner and Principal, DVS Capital Partners GP, LLC	04/2024 to Present
Tax Advisor, Don Settanni, CPA, PLLC	12/2011 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	10/2020 to 12/2023
Private Wealth Manager, Cetera Investment Advisers LLC d/b/a Settanni Financial	05/2014 to 11/2018
Registered Representative, Cetera Financial Specialists, LLC	04/2013 to 11/2018
Economist, Bureau of Labor Statistics	10/2009 to 10/2011

### 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. Also, CFA® charter holders 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. CFA® is a trademark owned by CFA® Institute.

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Mr. Settanni.*** Mr. Settanni 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. Settanni. 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. Settanni.*** However, we do encourage you to independently view the background of Mr. Settanni on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5559889.

## Item 4 – Other Business Activities

---

### Insurance Agency Affiliations

Mr. Settanni is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Settanni's role with Settanni Financial. As an insurance professional, Mr. Settanni will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Settanni is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Settanni or the Advisor.

### Tax and Accounting Services

Mr. Settanni is also an employee of Don Settanni, CPA, PLLC, a tax and accounting firm under common control with the Advisor. The accounting firm will provide its services to Clients of the Advisor and clients of the accounts

---

Sutton Place Investors LLC  
6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>



firm may also be offered the advisory services of the Advisor. Clients are not required to utilize the services provided by Don Settanni, CPA, PLLC.

DVS Capital Partners GP, LLC/DVS Capital Partners LP, LLC/DVS Capital Partners Management, LLC.

Mr. Settanni is also the Owner and Principal of DVS Capital Partners GP, LLC. DVS Capital Partners GP, LLC serves as the General Partner to DVS Capital Partners LP, LLC an exempt-from-registration pooled investment vehicle created for the purpose of providing investors with returns that are not correlated with broader equity markets (the "Fund"). The General Partner offers to third-party investors and Clients of Settanni Financial (collectively "Investors") direct access to the Fund.

Mr. Settanni is also the Owner and Principal of DVS Capital Management, LLC, which serves as an exempt-from-registration investment manager to DVS Capital Partners LP, LLC.

Due to the affiliation between the General Partner, Investment Manager, and Settanni Financial, management persons have a financial incentive to recommend that Clients invest in the Fund. To address this conflict, Settanni Financial will not receive any investment advisory fees on assets invested by Clients into the fund. Prior to recommending an investment into the Fund, Settanni Financial will conduct appropriate due diligence to ensure the recommendation to a Client to invest aligns with the Client's investment needs and objectives. In addition, Settanni Financial will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation as it relates to the Fund. Finally, there is no requirement for Settanni Financial to recommend the Fund to Clients, nor are Clients obligated to invest in the Fund.

#### **Item 5 – Additional Compensation**

---

Mr. Settanni has additional business activities that are detailed in Item 4 above.

#### **Item 6 – Supervision**

---

Mr. Settanni serves as the Chief Executive Officer of Settanni Financial and is supervised by Vito Collacuro, the Chief Compliance Officer. Vito Collacuro can be reached at (914) 767-0974.

Settanni Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Settanni Financial. Further, Settanni Financial is subject to regulatory oversight by various agencies. These agencies require registration by Settanni Financial and its Supervised Persons. As a registered entity, Settanni Financial is subject to examinations by regulators, which may be announced or unannounced. Settanni Financial 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.

---

**Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Vito M. Collacuro  
Chief Compliance Officer and Financial Advisor**

**Effective: April 12, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Vito M. Collacuro (CRD# 6280447) in addition to the information contained in the Sutton Place Investors LLC dba Settanni Financial (“Settanni Financial” or the “Advisor”, CRD# 298989) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Settanni Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (914) 767-0974.

Additional information about Mr. Collacuro is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6280447.

---

**Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

---

## Item 2 – Educational Background and Business Experience

---

Vito M. Collacuro, born in 1983, is dedicated to advising Clients of Sutton Place as a Financial Advisor. Mr. Collacuro earned a Bachelor's Degree from University at Albany - State University of New York in 2007. Mr. Collacuro also earned an Associates Degree from Westchester Community College. Additional information regarding Mr. Collacuro's employment history is included below.

### Employment History:

Chief Compliance Officer and Financial Advisor, Sutton Place Investors LLC dba Settanni Financial	10/2018 to Present
Financial Advisor, Cetera Investment Advisers LLC d/b/a Settanni Financial	12/2013 to 11/2018
Registered Representative, Cetera Financial Specialists LLC	12/2013 to 11/2018
Manager, Pizza Pizzazz	04/1998 to 11/2013

---

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Mr. Collacuro.*** Mr. Collacuro 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. Collacuro.

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. Collacuro.***

However, we do encourage you to independently view the background of Mr. Collacuro on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6280447.

---

## Item 4 – Other Business Activities

---

### Tax and Accounting Services

Mr. Collacuro is also an employee of Don Settanni, CPA, PLLC, a tax and accounting firm under common control with the Advisor. The accounting firm will provide its services to Clients of the Advisor and clients of the accounts firm may also be offered the advisory services of the Advisor. Clients are not required to utilize the services provided by Don Settanni, CPA, PLLC.

---

## Item 5 – Additional Compensation

---

Mr. Collacuro has additional business activities that are detailed in Item 4 above.

---

## Item 6 – Supervision

---

Mr. Collacuro serves as a Chief Compliance Officer of Sutton Place and can be reached at (914) 767-0974.

Sutton Place has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Sutton Place. Further, Sutton Place is subject to regulatory oversight by various agencies. These agencies require registration by Sutton Place and its Supervised Persons. As a registered entity, Sutton Place is subject to examinations by regulators, which may be announced or unannounced. Sutton Place 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.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Michael M. Capuano  
Wealth Advisor**

**Effective: April 12, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Michael M. Capuano (CRD# 7464833) in addition to the information contained in the Sutton Place Investors LLC (“Settanni Financial” or the “Advisor”, CRD# 298989) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Settanni Financial Disclosure Brochure or this Brochure Supplement, please contact us at (914) 767-0974.

Additional information about Mr. Capuano is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7464833.

---

**Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

---

## Item 2 – Educational Background and Business Experience

---

Michael M. Capuano, born in 1986, is dedicated to advising Clients of Settanni Financial as a Wealth Advisor. Mr. Capuano earned a Bachelor's Degree in Business Administration from Northwood University in 2009. Additional information regarding Mr. Capuano's employment history is included below.

### Employment History:

Wealth Advisor, Sutton Place Investors LLC d/b/a Settanni Financial	05/2023 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	04/2023 to Present
Financial Professional, The Prudential Insurance Company of America	04/2022 to 04/2023
Registered Representative, Pruco Securities, LLC	11/2021 to 04/2023
Relationship Banker, Citibank N.A.	01/2016 to 10/2021

---

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Mr. Capuano.*** Mr. Capuano 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. Capuano.

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. Capuano.***

However, we do encourage you to independently view the background of Mr. Capuano on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7464833.

---

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Capuano is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Mr. Capuano's separate capacity as a registered representative, Mr. Capuano will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Capuano. Neither the Advisor nor Mr. Capuano will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Capuano's separate capacity as a registered representative. Mr. Capuano spends approximately 10% of his time per month in his role as a registered representative of PKS.

### Insurance Agency Affiliations

Mr. Capuano is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Capuano's role with Settanni Financial. As an insurance professional, Mr. Capuano will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Capuano is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Capuano or the Advisor. Mr. Capuano spends approximately 10% of his time per month in this capacity.

---

## Item 5 – Additional Compensation

---

Mr. Capuano has additional business activities where compensation is received that are detailed in Item 4 above.

## **Item 6 – Supervision**

---

Mr. Capuano serves as a Wealth Advisor of Settanni Financial and is supervised by Vito Collacuro, the Chief Compliance Officer. Mr. Collacuro can be reached at (914) 767-0974.

Settanni Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Settanni Financial. Further, Settanni Financial is subject to regulatory oversight by various agencies. These agencies require registration by Settanni Financial and its Supervised Persons. As a registered entity, Settanni Financial is subject to examinations by regulators, which may be announced or unannounced. Settanni Financial 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.

---

**Sutton Place Investors LLC**

6 Sutton Place, Katonah, NY 10536  
Phone: (914) 767-0974 \* Fax: (914) 617-1517  
<http://www.settannifinancial.com>

## Privacy Policy

---

Effective: April 12, 2024

### Our Commitment to You

Sutton Place Investors LLC dba Settanni Financial ("Settanni Financial" 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, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Settanni Financial (also referred to as "we", "our" and "us") 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.

Settanni Financial does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable 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 Policy.

### Why you need to know?

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

### What information do we collect from you?

Driver's license number	Date of birth
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 Information do we collect from other sources?

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 do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they



receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. Settanni Financial shares Client information with Purshe Kaplan Sterling Investments, Inc. ("PKS") due to the oversight PKS has over certain supervised persons of the Advisor. You may also contact us at any time for a copy of the PKS Privacy Policy.	Yes	No
<b>Marketing Purposes</b> Settanni Financial 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 Settanni Financial or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Settanni Financial 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.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this 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.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting the Advisor at (914) 767-0974.