

Item 1 – Cover Page

Part 2A of Form ADV

Coletta Asset Management, LLC

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This Brochure provides information about the qualifications and business practices of Coletta Asset Management, LLC. If you have any questions about the contents of this Brochure, please contact us using the information listed above. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Coletta Asset Management, LLC (CRD# 328100) is a registered investment advisor with the SEC. Registration of an investment advisor does not imply any certain level of skill or training.

Additional information about Coletta Asset Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

Since this is the initial filing of this brochure, there are no material changes to report.

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## Item 4 – Advisory Business

### A. Description of the Advisory Firm

Coletta Asset Management, LLC (“Coletta”), was formed on July 14<sup>th</sup>, 2023 and based in Madrid Spain. Coletta has been providing investment advisory services since 2023. Coletta’s principal owner is Jean Carlos Coletta.

### B. Types of Advisory Services

#### ASSET MANAGEMENT

Coletta offers asset management services to advisory Clients. Coletta will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

#### Discretionary

When the Client elects to use Coletta on a discretionary basis, the Client will sign a limited trading authorization or equivalent allowing Coletta to determine the securities to be bought or sold and the amount of the securities to be bought or sold. Coletta will have the authority to execute transactions in the account without seeking Client approval on each transaction.

#### Non-Discretionary

When the Client elects to use Coletta on a non-discretionary basis, Coletta will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, Coletta will obtain prior Client approval on each and every transaction before executing any transaction.

Coletta may also select and appoint one or more Sub-Advisor(s) to provide Sub-Advisor Services to Client’s Account. Such Sub-Advisor Services will be as determined by Coletta. Such Sub-Advisor(s), in providing Sub-Advisor Services, shall have all of the same authority relating to the management, including fee deduction authority, of Client’s Account as is granted to Coletta. In addition, at Coletta’s discretion, Coletta may grant such Sub-Advisor(s) full authority to further delegate such discretionary investment authority to other Money Managers. Client will agree to such authority within Coletta’s Advisory Agreement.

#### FINANCIAL PLANNING AND CONSULTING

Services include an evaluation of a Client’s current and future financial state using currently known variables to predict future cash flows, asset values, recommend purchase and sales, and withdrawal plans. Coletta will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans. Topics for planning may include, but are not limited:

- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Long-term investment plan:** Build a customized asset allocation strategy based on specific

investment objectives and a risk profile. This strategy sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.

• **Tax reduction strategy:** Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax favored investment vehicles that can reduce taxation of investment income.

If a conflict of interest exists between the interests of Coletta and the interests of the Client, the Client is under no obligation to act upon Coletta's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through Coletta.

C. Client-Tailored Services and Client-Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. These restrictions may, however, prohibit engagement with Coletta.

D. Wrap Fee Programs

Coletta does not participate in a Wrap Program.

E. Amounts Under Management

As of the date of this brochure, Coletta provides management services for:

Discretionary Assets:	Non-Discretionary Assets:
\$0	\$0

## Item 5 – Fees and Compensation

A. Fee Schedule

ASSET MANAGEMENT

Coletta offers asset management services to advisory Clients. Coletta charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee
Up to \$250,000	1.25%
\$250,001 to \$1,000,000	1.00%
\$1,000,001 to \$2,500,000	0.80%
\$2,500,001 to \$5,000,000	0.50%
Over \$5,000,000	0.40%

Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous billing period. Lastly, please note that Coletta may

group certain related Client accounts, often known as “householding”, for the purposes of achieving the minimum account size and determining the annualized fee.

#### FINANCIAL PLANNING AND CONSULTING

Coletta charges an hourly fee for financial planning and consulting. Prior to the planning process the Client will be provided an estimated plan fee which will be based on the complexity of the engagement. For hourly fee arrangements, services will be completed and delivered within ninety (90) days contingent upon timely delivery of all required documentation. Coletta reserves the right to waive the fee should the Client implement the plan through Coletta.

#### HOURLY FEES

Hourly Fee Services are offered based on an hourly fee of \$350 per hour. Fees for financial plans are billed upon completion of the plan.

#### B. Payment of Fees

Asset Management Fees are deducted directly from the Client’s Account.

Sub-Advisor Fees are deducted directly from the Client’s Account.

Financial Planning and Consulting Fees are generally invoiced directly to the Client but may also be deducted from another account held with Coletta.

Coletta, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

For all services, Clients may terminate their engagement with Coletta within five (5) business days of signing an Agreement with no obligation and without penalty. After the initial (5) business days, the Agreement may be terminated by Coletta with thirty (30) days written notice to Client and by the Client at any time with written notice to Coletta. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. In the case of hourly engagements, fees will be prorated based on the work completed at the stated hourly rate. All unpaid earned fees will be due to Coletta and all unearned fees will be refunded to the Client. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

#### C. Additional Fees

Custodians may charge brokerage commissions, transaction fees, and other related costs on the purchases or sales of mutual funds, equities, bonds, options, margin interest, and exchange-traded funds. Mutual funds, money market funds, and exchange-traded funds may also charge internal management fees, which are disclosed in the fund’s prospectus. Coletta does not directly receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Coletta. For more details on the brokerage practices, see Item 12 of this brochure.

D. Prepayment of Fees

Coletta does not expect Clients to prepay fees.

E. External Compensation for the Sale of Securities

Coletta does not receive any external compensation from the sale of securities.

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

Coletta will receive a performance fee based on the capital gains. Performance based fee arrangements of Coletta will comply with Section 205(e) of the Investment Advisers Act of 1940. According to Section 205(e) (see Rule 205-3 thereunder), only natural persons meeting the SEC's definition of "qualified clients" may enter into agreements providing for performance-based compensation to Coletta. A natural person or company is a qualified client who, generally, has:

- \$2.2 million investable assets (increased from \$2 million in 2016 and \$2.1 million in 2021)
- \$1.1 million invested with Coletta (increased from \$1 million in 2021)
- Is a "qualified purchaser" under Section 2(a)(51)(A) of the Investment Company Act.
- An executive officer, director, trustee, general partner, or person serving in a similar capacity, of the investment adviser
- An employee of the investment adviser (other than an employee performing solely clerical, secretarial or administrative functions with regard to the investment adviser) who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar functions or duties for or on behalf of another company for at least 12 months.

In addition, Section 205 exempts from the prohibition to charge a performance fee clients the meet the definition of investment company by section 3(c)(7) of the Investment Company Act and contracts with persons who are not residents of the United States.

The performance fee will be equal to 20% of any gains in excess of the agreed upon benchmark. Coletta shall receive no performance fee for any period where a loss is incurred.

- The performance fee will be calculated based on a calendar 12-month billing period, paid annually and assessed as of the close of business on the last day of the billing period, Coletta's calculation consists of taking the performance fee of net-of-fee returns over the agreed-upon benchmark (e.g. S&P 500). This fee is in addition to the investment management fee as outlined above.

Performance fees can cause Coletta to engage in transactions or strategies which will increase the amount of the performance fees, but which may not increase the overall performance of the client's account.

There are conflicts of interest Coletta faces by managing some client accounts on a performance-based fee arrangement at the same time as managing asset-based, non-performance-based accounts. For example, the nature of a performance fee poses an opportunity for Coletta to earn more compensation than under a stand-alone asset-based fee. Consequently, Coletta could favor performance-based accounts over those accounts where Coletta's receive only an asset- based fee. This creates the incentive to devote more time and attention to performance-based accounts

than to accounts under an asset-based fee-only arrangement. This conflict is mitigated by disclosures, procedures and Coletta's fiduciary obligation to place the best interest of the Client first.

## **Item 7 – Types of Clients & Account Minimums**

Coletta's Clients are generally individuals, small businesses, trusts, estates, high net-worth individuals, pooled investment vehicles, and charities. Client relationships vary in scope and length of service.

There is no minimum account size and Clients are not required to have a certain amount of investment experience or sophistication.

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

### **A. Methods of Analysis and Investment Strategies**

Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns. Security analysis methods may include:

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

In developing a financial plan for a Client, Coletta's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the SEC.

### **B. Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to Coletta. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

### **C. Risks of Investments and Strategies Utilized**

Investing in securities involves risk of loss that Clients should be prepared to bear. Coletta's investment approach constantly keeps the risk of loss in mind. Investors may face the following investment risks:



**General Investment and Trading Risks.** Clients may invest in securities and other financial instruments using strategies and investment techniques with significant risk characteristics. The investment program utilizes such investment techniques as option transactions, margin transactions, short sales, leverage, and derivatives trading, the use of which can, in certain circumstances, maximize the adverse impact to which a Client may be subject.

**Interest-rate Risk.** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

**Inflation Risk.** When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.

**Currency Risk.** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

**Reinvestment Risk.** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

**Liquidity Risk.** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

**Management Risk.** The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

**Cybersecurity Risk.** Coletta and its service providers may be subject to operational and information security risks resulting from cyberattacks. Cyberattacks include, among other behaviors, stealing or corrupting data maintained online or digitally, denial of service attacks on websites, the unauthorized release of confidential information or various other forms of cybersecurity breaches. Cybersecurity attacks affecting Coletta and its service providers may adversely impact Clients. For instance, cyberattacks may interfere with the processing of transactions, cause the release of private information about Clients, impede trading, subject Coletta to regulatory fines or financial losses, and cause reputational damage. Similar types of cybersecurity risks are also present for issuers of securities in which Clients may invest in, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions. Cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damages, and loss from damage or interruption of systems. Although Coletta has established its systems to reduce the risk of these incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that Coletta does not directly control the cybersecurity measures and policies employed by third party service providers.

**Options Trading.** The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before

the option expires). Additionally, options are less tangible than some other investments. An option is a “book-entry” only investment without a paper certificate of ownership.

**Trading on Margin.** In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the Client will be required to deposit additional cash or make full payment of the margin loan to bring the account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.

The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment with Coletta.

### Item 9 – Disciplinary Information

Coletta and its management have not been involved in any criminal or civil actions, administrative or self-regulatory enforcement proceedings, nor any legal or disciplinary events that are material to a Client’s or prospective Client’s evaluation of Coletta or the integrity of its management.

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

A. Registration as a Broker-Dealer or Broker-Dealer Representative

Neither Coletta nor its management persons are registered as a broker-dealer or broker-dealer representative.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Coletta nor its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading advisor.

C. Relationships Material to this Advisory Business and Possible Conflicts of Interest

Neither Coletta nor its representatives have any additional material relationships to this advisory business that would present a possible conflict of interest other than what may be disclosed above.

D. Selection of Other Advisors or Managers

Coletta may select and appoint one or more Sub-Advisor(s) to provide Sub-Advisor Services to Client Accounts. When selecting Sub-Advisors, the Client’s best interest will be the main determining factor of Coletta. Coletta ensures that before selecting other Sub-Advisors that they are properly licensed or registered as an investment advisor.

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

A. Code of Ethics

The affiliated persons (affiliated persons include employees and/or independent contractors) of Coletta have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth

standards of conduct expected of Coletta affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Coletta. The Code reflects Coletta and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Coletta's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of Coletta may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Coletta's Code is based on the guiding principle that the interests of the Client are our top priority. Coletta's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public. Coletta will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

**B. Recommendations Involving Material Financial Interests**

Neither Coletta nor its related persons recommend to Clients, or buys or sells for Client accounts, securities in which Coletta or a related person has a material financial interest.

**C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Coletta and its affiliated persons may invest in the same securities (or related securities, e.g., warrants, options or futures) that Coletta or an affiliated person recommends to Clients. In order to mitigate conflicts of interest, such as frontrunning, Coletta's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its affiliated persons. These reviews ensure that the personal trading of affiliated persons does not disadvantage Clients of Coletta.

**D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Coletta and its affiliated persons may recommend securities, or buy or sell securities for Clients accounts, at or about the same time, that they also buy or sell the same securities in their own account(s). Coletta, for instance, will place trades in an account in an attempt to earn better than money market rates. In order to mitigate conflicts of interest, such as frontrunning, Coletta's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal

holdings of its affiliated persons. These reviews ensure that the personal trading of affiliated persons does not disadvantage Clients of Coletta.

## Item 12 – Brokerage Practices

### A. Factors Used to Select or Recommend Broker-Dealers

Coletta requires the use of a specific broker-dealer. Coletta will select appropriate brokers based on a number of factors including but not limited to their transaction fees, quality of customer service, and reporting ability. Coletta relies on the broker-dealer to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Coletta. Please note that not all Investment Advisors require that their clients direct brokerage.

#### 1. Research and Other Soft Dollar Benefits

Coletta does not receive soft dollar benefits.

#### 2. Brokerage for Client Referrals

Coletta does not receive Client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

#### 3. Directed Brokerage

Coletta does not allow Client directed brokerage.

Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

### B. Aggregating Trading for Multiple Client Accounts

When a Client authorizes discretionary management, Coletta is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Coletta. All Clients participating in the aggregated order shall receive an average share price with all other transactions. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred. Coletta will always attempt to aggregate orders whenever it has the opportunity to do so.

## Item 13 – Review of Accounts

### A. Frequency and Nature of Periodic Review and Who Makes Those Reviews

Account reviews are performed at least annually by the Chief Compliance Officer of Coletta. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to

account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans are updated as requested by the Client and pursuant to a new or amended agreement, Coletta suggests updating at least annually.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

C. Content and Frequency of Regular Reports

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Client's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Coletta may also send periodic or other event-inspired reports based on market or portfolio activity. Reports will generally be provided in electronic format.

## **Item 14 – Client Referrals and Other Compensation**

A. Economic Benefits from Others

Coletta does not receive any economic benefits from external sources.

B. Compensation to Non-Advisory Personnel for Client Referrals

Coletta does not compensate for Client referrals.

## **Item 15 – Custody**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by Coletta.

Coletta is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Coletta. Coletta will obtain written authorization from Client to allow for such deductions.

Coletta is not affiliated with the custodian. The custodian does not supervise Coletta, its employees or activities.

## **Item 16 – Investment Discretion**

If applicable, Client will authorize Coletta discretionary authority, via the Advisory Agreement, to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. If applicable, Client will authorize Coletta discretionary authority to execute selected investment program transactions as stated within the

Investment Advisory Agreement. If however, consent for discretion is not given, Coletta will obtain prior Client approval before executing each transaction.

Coletta allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Coletta in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. Coletta does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

### Item 17 – Voting Client Securities

Clients will receive proxy voting information directly from the issuer and/or custodian of the security. Clients will not receive any such proxy voting material from Coletta. However, when assistance on voting proxies is requested, Coletta will provide recommendations to the Client. When assistance on voting proxies is requested, Coletta will provide recommendations to the Client. However, Coletta will not have authority to vote proxies on behalf of the Client. If in the future Coletta obtains authority to vote proxies, this Brochure will be appropriately amended. Clients may contact Coletta at +34 635771141 or [jeancoletta@gmail.com](mailto:jeancoletta@gmail.com).

### Item 18 – Financial Information

#### A. Balance Sheet

Coletta does not require nor solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance.

#### B. Financial Condition

At this time, neither Coletta nor its management persons have any financial conditions that are likely to reasonably impair its ability to meet contractual commitments to Clients.

#### C. Bankruptcy Petitions in Previous Years

Coletta has not been the subject of a bankruptcy petition in the last ten years.

**SUPERVISED PERSON BROCHURE  
Part 2B of Form ADV**

**Coletta Asset Management, LLC**

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**September 2023**

This brochure supplement provides information about Jean Carlos Coletta and supplements the Coletta Asset Management, LLC brochure. You should have received a copy of that brochure. Please contact Jean Carlos Coletta if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Jean Carlos Coletta (CRD# 5194051) is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Supervised Person Brochure - Jean Carlos Coletta

Year of birth: 1981

### Item 2 - Educational Background and Business Experience

Educational Background:

- IE Business School - Madrid, Spain; Masters in Advanced Finance, 01/2011 – 12/2011
- Oral Roberts University; Bachelor of Science in International Business; 1999 – 2003

Business Experience:

- Coletta Asset Management, LLC; Investment Advisor Representative; 07/2023 – Present
- Transearth Europe S.L.; Owner; 03/2021 – Present
- Neodata IT Solutions; Business Development; 03/2018 – 02/2021
- Unemployed; 01/2016 – 02/2018
- SP Consulting; Business Development; 09/2014 – 01/2016
- Versus Wealth Management; Business Development; 02/2014 – 09/2014
- Union Investment Management; Associate; 01/2013 – 12/2013

### Item 3 - Disciplinary Information

*Criminal or Civil Action:* None to report

*Administrative Proceeding:* None to report

*Self-Regulatory Proceeding:* None to report

### Item 4 - Other Business Activities Engaged In

Jean Carlos Coletta has outside business activities as follows:

- Transearth Europe S.L.

Approximately 35% of their time is spent on the above practices and from time to time, may offer Clients services from these activities.

These practices represent conflicts of interest because they give Jean Carlos Coletta an incentive to recommend products and or services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and Coletta's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to purchase or engage Jean Carlos Coletta for any products or services offered as Clients have the option to purchase them through another person or entity of their choosing.

### Item 5 - Additional Compensation

Jean Carlos Coletta receives fees on the outside business activities as outlined above and also may receive performance-based fees as outlined in Item 6 of the ADV 2A. He does not receive any additional compensation for performing advisory services other than what is disclosed in Item 4 of Part 2A.

### Item 6 - Supervision

Jean Carlos Coletta is the Chief Compliance Officer of Coletta, and therefore is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. The Chief Compliance Officer, Jean Carlos Coletta can be reached at +34 635771141 or [jeancoletta@gmail.com](mailto:jeancoletta@gmail.com).