



# SVVY, LLC

4417 N. 40th St, Ste. 300C Phoenix, AZ 85018

[www.besvvy.com](http://www.besvvy.com)

[admin@besvvy.com](mailto:admin@besvvy.com)

March 24, 2024

## **Item 1: Firm Brochure (Form ADV Part 2A)**

This brochure provides information about the qualifications and business practices of Svvy, LLC. If you have any questions about the contents of this brochure, please contact us at the phone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration (e.g. “registered investment advisor”) does not imply a certain level of skill or training.

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



## **Item 2: Material Changes**

This Brochure was prepared pursuant to SEC disclosure requirements.

In this Item, Svvy, LLC is required to discuss any material changed that have been made to the brochure since the last update and initial filing dated April 5, 2023

- There have been no material changes since the last update dated April 5, 2023.



## Item 3 Table of Contents

Item 1: Firm Brochure (Form ADV Part 2A)	1
Item 2: Material Changes	1
Item 3 Table of Contents	3
Item 4 Advisory Business	4
Item 5 Fees and Compensation	4
Item 6 Performance-Based Fees and Side-By-Side Management	4
Item 7 Types of Users	4
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	5
Item 9 Disciplinary Information	7
Item 10 Other Financial Industry Activities and Affiliations	8
Item 11 Code of Ethics, Conflicts of Interest, and Personal Trading	8
Item 12 Brokerage Practices	8
Item 13 Review of Accounts	8
Item 14 User Referrals and Other Compensation	8
Item 15 Custody	9
Item 16 Investment Discretion	9
Item 17 Voting User Securities	9
Item 18 Financial Information	9



## **Item 4 Advisory Business**

### ***Firm Description***

Svvy, LLC (“Svvy” or the “Firm”) is an SEC registered investment advisor. Svvy was founded in January 2023.

The Principal Owner and Chief Compliance Officer of Svvy is Jenna Biancavilla.

### ***Investment Advisory Services***

Svvy offers solicitor services to users of our online platform. Svvy has an online questionnaire that website users will fill out and will refer users to potential third party licensed experts, investment advisor representatives, and registered investment advisors (“Advisors”) who are registered according to state or federal requirements. The Firm will refer users to third-party Advisors & licensed experts such as insurance agents, realtors, and lawyers (“Experts”) who have elected to partner with Svvy and been vetted through Svvy’s questionnaires and interviews. The Firm will not review the ongoing performance of any third-party licensed Experts & Advisors. Further, Svvy will not participate in the management of any User’s account or provide advice regarding specific investments. The User has full discretion to determine whether they want to utilize the services of a third-party Advisor. The Firm does not review the ongoing performance of any Advisor or Expert, participate in the management of any User’s account by an Advisor or Expert, or provide advice regarding specific investments. Further, Svvy does not establish advisory accounts or manage any User assets.

Svvy does not manage any User assets. As of March 24, 2024, Svvy managed \$0 for Users.

## **Item 5 Fees and Compensation**

Svvy collects a subscription fee from Advisors/Experts who have elected to receive referrals from Svvy. Svvy receives this subscription compensation from Experts/Advisors regardless of the User selecting/using the Advisor/Expert’s services. If User works with third party Advisor/Expert, User will pay fees to that Advisor/Expert based on the services the Advisor provides to the User and the terms and conditions of any agreements between the User and the Advisor. Therefore, via the subscription, Svvy will receive a referral fee from the Advisors to whom the User may be matched based on the agreement between the Advisor/Expert and Svvy. Users may also incur certain fees or charges imposed by third parties, independent from Svvy, in connection with their investments.

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

Svvy does not charge or accept performance-based fees as it does not manage assets. Svvy does not restrict its platform to any individuals and therefore does not require a minimum level of wealth to use the platform.

## **Item 7 Types of Users**

Svvy provides match making services to individuals and high-net worth individuals and provides referral services for companies.



Svvy does not restrict its platform to any individuals and therefore does not require a minimum level of wealth to use the platform. However, Users should understand that third-party Advisors may have an account minimum requirements, and these minimum requirements vary between Advisors.

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

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

Svvy does not manage User Assets and therefore does not utilize any investment strategies or methods of analysis.

When referring Users to an Advisor Svvy verifies that each Advisor is properly registered with either the SEC or FINRA, the required state, or licensing authority. Further, Svvy considers all Advisor applicants, regulatory history, and professional credentials when conducting a due diligence review of the Advisor. Svvy does not review or consider an Advisor's investment strategies, investment performance or any other aspect of an Advisor's investment advice in the due diligence process. To be accepted onto our platform, Advisors must meet Svvy's initial and ongoing vetting criteria.

### **B. *Risk of Loss***

While Svvy does not provide investment advice Users should understand that investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee. Svvy does not provide any representation or guarantee that the financial goals of Users will be achieved.

The potential return or gain and potential risk or loss of an investment varies, generally speaking, with the type of product invested in. Below is an overview of the types of products available on the market and the associated risks of each:

**General Risks.** Investing in securities always involves risk of loss that you should be prepared to bear. We cannot offer any guarantees or promises that your financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. We also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.

**General Market Risk.** Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.

**Common Stocks.** Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry changes. Such price fluctuations subject certain strategies to potential losses. During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.



Portfolio Turnover Risk. High rates of portfolio turnover could lower performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in short-term capital gains and under current tax law you would be taxed on short-term capital gains at ordinary income tax rates, if held in a taxable account.

Non-Diversified Strategy Risk. Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

Model Risk. Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. There is no guarantee any model will work under all market conditions.

ETF Risks, including Net Asset Valuations and Tracking Error. An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depository Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Users should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by Adviser plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a User purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a User's portfolio performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Inflation, Currency, and Interest Rate Risks. Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed may be affected by the risk that currency devaluations affect User purchasing power.



**Liquidity Risk.** Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established market of purchasers and sellers may be considered illiquid. Your investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert your investment to cash or other assets.

**Legislative and Tax Risk.** Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/Securities. In certain circumstances a User may incur taxable income on their investments without a cash distribution to pay the tax due. Users and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

**Foreign Investing and Emerging Markets Risk.** Foreign investing involves risks not typically associated with U.S. investments, and the risks maybe exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social, and economic developments affecting one or more foreign countries.

In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

**Information Security Risk.** Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by Advisors and Experts. Data security breaches of our electronic data infrastructure could have the effect of disrupting an Advisor or Experts operations and compromising our Users confidential and personally identifiable information. Such breaches could result in an inability of the Advisor or Expert to conduct business, potential losses, including identity theft, and other adverse consequences to Users.

## **Item 9 Disciplinary Information**

Registered investment Advisors are required to disclose any legal or disciplinary events that are material to a User's or prospective User's evaluation of the advisory business or integrity of the Firm's management.



Svvy has no disciplinary disclosures that are material to a User's evaluation of Svvy's solicitor business.

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

### ***Registration as a Broker/Dealer or Broker/Dealer Representative***

Svvy is not registered and does not have an application pending to register, as a broker dealer and its management persons are not registered as broker/dealer representative.

### ***Registration as a Futures Commission merchant, Commodity Pool Operator***

Svvy and its management persons are not registered and do not have application pending to register, as a futures commission merchant, commodity pool operator/advisor.

### ***Relationships Material to this Advisory Business and Possible Conflicts of Interest***

Svvy is under common control with 17 Capital Partners, LLC DBA Pearl Capital Management (17 Capital Partners) (CRD # 283013) which is an SEC registered investment advisor. 17 Capital Partners does provide investment advice to individuals and charges a fee based on a User's percentage of the assets under management with 17 Capital Partners. Therefore, Svvy has a conflict of interest as we have an incentive to direct Users to 17 Capital Partners. Svvy's questionnaire and referral system will not favor 17 Capital Partners over another third-party Advisor in the matching process. Svvy also has internal policies that address and mitigate this conflict of interest.

## **Item 11 Code of Ethics, Conflicts of Interest, and Personal Trading**

### ***A. Fiduciary Status***

According to SEC law, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its Clients.. Svvy and its employees have a fiduciary duty to all Clients, however, Svvy does not manage assets and thus does not have clients as of March 24, 2024.

If Svvy had Clients, Svvy and its employees' fiduciary duty to Clients would be considered the core underlying principle for Svvy Code of Ethics and represent the expected basis for all employees' dealings with Clients. Svvy has the responsibility to ensure that if it obtains Clients, the interests of Clients are placed ahead of it or its employees interest.

All representatives are expected to conduct business in an honest, ethical, and fair manner.

## **Item 12 Brokerage Practices**

Svvy does not select or recommend broker dealers or custodians. However, Svvy encourages Users to discuss and review the brokerage practices of the Advisors we recommend to you.

## **Item 13 Review of Accounts**

Svvy does not review User accounts. Svvy does not manage any assets and therefore no accounts require review.





## **Item 14 User Referrals and Other Compensation**

As described further in Item 4 and 5 above, Svvy refers Users to third-party Advisor & Experts for a subscription fee for referring Users to the Advisor/Expert. Svvy enters into an agreement with each third-party Advisor which outlines the subscription fee paid to Svvy.

## **Item 15 Custody**

Custody means holding, directly or indirectly, User funds or securities or having any authority to obtain possession of them. Svvy does not have custody of any User funds and/or securities. Svvy will not maintain physical possession of User funds and securities. While Svvy does not have custody of User funds or securities, we encourage Users to discuss and review the brokerage practices of the Advisors we recommend to you.

## **Item 16 Investment Discretion**

Svvy does not exercise any investment discretion over User assets as we do not manage User assets. However, Svvy encourages Users to discuss and review the discretionary authority of the Advisors we recommend to you.

## **Item 17 Voting User Securities**

The Firm does not perform proxy voting services on the User's behalf. Users are encouraged to read through the information provided by third party Advisor with the proxy voting documents and to make a determination based on the information provided.

## **Item 18 Financial Information**

### ***A. Balance Sheet Requirement***

Svvy is not the qualified custodian for User funds or securities and does not require prepayment of fees of more than \$1200 per User, six (6) months or more in advance.

### ***B. Financial Condition***

Svvy does not have any financial impairment that would preclude the Firm from meeting our obligations to Users.

### ***C. Bankruptcy Petition***

Svvy has not been the subject of a bankruptcy petition at any time during the last 10 years.