

**Item 1. Cover Page**

Equity Armor Investments, LLC

311 S. Wacker Dr., Suite 650

Chicago, Illinois 60606



**EQUITY ARMOR**  
I N V E S T M E N T S

FORM ADV - PART 2A INFORMATION

February 22, 2016

This brochure provides information about the qualifications and business practices of Equity Armor Investments, LLC. If you have any questions about the contents of this brochure, please contact us at 312-253-0423. 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 does not imply a certain level of skill or training.

Additional information about Equity Armor Investments, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and at [www.stutland.com](http://www.stutland.com) or at [www.equityarmorinvestments.com](http://www.equityarmorinvestments.com).

## **Item 2. Material Changes Since Last Updated Brochure**

**November 2015** - Item 4, total AUM (assets under management has changed to \$9M) addition of new strategy (9), change to strategy descriptions and fees associated with each strategy. Item 4, Section 3 and 4, update to how ARMOR and USARM are applied to client portfolios. Item 5, description of how EAI receives fees by removing sub-advisory mutual fund fees. Item 8, changed sentence quantitative analysis of equities from Sabrient Systems or similar firms to include "similar firms". Item 10, updated % ownership of EAI. Also, Brian Stutland trust has two outstanding loans to Trading Block. Relationship with Sabrient Systems. Brian Stutland resigned from CCO of KKM Financial in Spring 2015. Item 14, EAI no longer sub-advises to any mutual fund so fee disclosures for sub-advisory work is not necessary. Schedule B, changes to outside Business Activity for Luke Rahbari and Brian Stutland.

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#### **Item 4. Advisory Business**

Equity Armor Investments, LLC (“EAI”, “we” or “our”) began business in January, 2011 and its current owner is 99% Alpha II Zeta, LLC which in turn is owned by Brian Stutland (50%) and Afshin Luke Rahbari (50%), along with a 1% ownership by Joseph Tigay. As of October 1, 2015, EAI has approximately \$9,000,000 under management on a discretionary basis, which includes 6 individual clients and 3 affiliated accounts.

We provide investment supervisory services in return for a fee calculated as a percentage of assets under management. Services are offered and provided to individuals, trusts, institutions, advisory firms, and investment companies. We offer advice on stocks (exchange listed and over the counter), futures contracts, warrants, corporate debt, commercial paper, certificates of deposit, municipal securities, U.S. Government Securities, option contracts on equities and futures, and partnerships investing in real estate and oil and gas interests. The analysis methods we use to evaluate investments and our strategies performances include charting, fundamental, technical and cyclical analysis.

In addition to the above, EAI makes available the following services to clients based upon client goals:

1) Portfolio Risk Management - EAI performs two levels of analysis on equity (stock) and equity derivatives portfolios. We first conduct a comparison of the portfolio in relation to various market and volatility indexes. To determine potential transactions, we further breakdown large stock holdings into sectors and then run comparisons of those sectors (e.g. health care, energy, etc.) against market and volatility indexes, and large exchange traded funds and holders of positions in those sectors.

2) Recommendations and Order Placement – After the Risk Management assessment is performed, we make recommendations designed to invest the client’s capital in the selected sectors more efficiently. We have back-tested several strategies and provide copies of those back-tested results to clients who have an interest in them to show how well returns may be improved with active management. Back tested results in no way assures returns and losses can occur from employing any investment strategy. In some strategies, real returns are provided as far back as 2008 and are described in each copy sent to the client.

3) Portfolio Insurance Strategies— EAI created an index, ARMOR, which seeks to own volatility in the most efficient manner. The ARMOR Index calculates an investable, long volatility position seeking to highly correlate with VIX (S&P 500 Volatility Index) total return over all time frames by searching for relative value between VIX futures (S&P 500 Volatility Futures) and S&P 500 Index options. Our volatility hedge strategy allow portfolios to be hedged from downside risk on an ongoing basis since the index typically has a negative correlation to the S&P 500 index. Thus, the strategy is designed to perform well in down markets with the goal of protecting losses in stock positions. Methodology used to create the index is used for clients, or a derivation of the methodology which seeks to track ARMOR or outperform ARMOR may be used to accommodate for less slippage, commissions, fees, better performance etc.

4) Portfolio Insurance with Stock Exposure Strategies - EAI created an index, USARM, which seeks to own volatility in the most efficient manner alongside exposure to large cap stocks. The U.S. Equity Armor Index aims to provide investors with superior, lower risk methods of participating in the U.S. equity

market. Equity exposure is gained via the SPY ETF, and a corresponding long volatility position, based on the ARMOR Index, is combined and rebalanced monthly. The methodology used to create the index is applied to client accounts, and the SPY ETF holding may or may not be swapped out for other equity classes depending on EAI's determination of best exposure to the equity markets. ARMOR exposure in the methodology may be dialed up or down depending on beta weighting of the equity exposure. Methodology used to create the index is used for clients, or a derivation of the methodology which seeks to track USARM or outperform USARM may be used to accommodate for less slippage, commissions, fees, better performance etc.

5) Active Overlay Management—We use equity and index option strategies designed to add income to stock portfolios. Single stocks or ETFs, which are either picked by our team using research analytics on a fundamental and technical base or selected by our clients, are hedged with option sales in order to bring in added income on investor's equity asset holding. Instead of simply buying a security and writing a call option against it to generate income, we use volatility measures, earnings expectations and sector performance to initiate our trades. We monitor the trades on a live basis and have proprietary software automated with alerts in place for all options and underlying securities in order to create a rolling program in and out of option positions.

6) Equity Strategies --When using this strategy, we utilize a list of stocks generated from Unit Investment Trusts. Quality of stock selection is determined based on the track record of stock selection by managers of the Unit Investment Trusts. EAI searches for managers that consistently advise to investment management companies where such managers outperform returns of the S&P 500 index over a long duration of time.

7) Tactical Macro - The Tactical Asset Allocation SMA is a long-only, non-levered, U.S.-centric macro strategy that seeks absolute return by allocating to US dollar denominated securities and commodities, including: equities, fixed-income, precious metals, volatility, cash and cash-equivalents. Portfolio construction is based on rigorous quantitative analysis of the relative correlation, momentum, and volatility of these assets. Strict risk management techniques are used to reduce draw downs and minimize portfolio volatility during turbulent markets. The fund aims to generate positive absolute returns across complete market cycles with a low sensitivity to traditional equity and fixed income investments.

8) Use of Volatility Arbitrage—Rather than initiating cash covered positions, we may also trade utilizing margin (borrowed funds) in order to capture volatility swings in the market on various stocks and indexes. Determining risk and direction between asset classes, trades are initiated to capture what EAI believes to be mispriced option premiums or mispriced implied volatility and volatility futures. Returns may not be correlated to moves of the stock market, but instead be based on price changes in options values and volatility expectations.

9) Use of fixed income – Seek various exposures to corporate and high yield bonds through the use of bond laddering and bond ETFs which combine the benefits of bonds (control of portfolio maturity, yield and credit quality) with the broad diversification, liquidity and convenience of ETFs.

Advisory services are tailored to the individual needs of clients, based upon a variety of factors discussed with clients at the outset of services. Clients may impose restrictions on investing in certain securities or types of securities by letting us know in writing. Also, clients are free to meet or confer with their EAI

services Representative at any time. Results of EAI services are discussed as conferences occur with each client.

We do not participate in any wrap fee program where the fee for our services is combined with the fee or commissions that a client's brokerage firm charges for transaction execution services.

#### **Item 5. Fees and Compensation**

We are compensated for its advisory services in accordance with the Fee Schedule set forth below.

Before clients are billed the fee calculation is reviewed by the firm's Representative providing services and approved by Brian Stutland before being submitted to the client for approval. Upon approval, the client instructs their respective broker-dealer to make the payment to us.

Clients pay all commissions and other costs and fees associated with or imposed by their respective broker-dealer. We do not impose fees, costs or expenses beyond those contained in the Fee Schedule below. Should an advisory contract be terminated by the client, the determination of advisory fees due, if any, shall be calculated on a prorated basis.

Fees are neither billed nor collected in advance.

A client has a right to terminate a contract for advisory services, without penalty, within five (5) business days after entering into the contract if the client did not receive the firm's Form ADV, Part 2A and Schedules 2B, or at any other time upon written notice.

The firm's Representatives providing advice to clients do not accept compensation for the sale of securities or other investment products. Nor do they receive asset-based sales charges or service fees from the sale of mutual funds. We try and avoid activities that by their nature or structure might provide an incentive for a Representative to choose one investment over another, or depart from clients' particular needs.

Clients can purchase investment products through brokerage firms and agents other than those recommended by us. Clients are required to select a broker of their choice prior to entering into the services agreement with us. That firm must be registered in the state in which the client resides.

## ADVISORS FEE SCHEDULE

Effective October 31, 2011

### Options, Overlay Consulting & Management Services – Annual Fee

For option, overlay consulting and management services (provided by Equity Armor Investments).  
Up to 2.50% of assets under management based on following schedule:

Net Asset Value

#### Annual Fee

Less than \$249,999: 2.50%

\$250,000 – 999,999: 2.25%

\$1,000,000 – 1,999,999: 2.00%

\$2,000,000 – 4,999,999: 1.50%

\$5,000,000 – 9,999,999: 1.00%

\$10,000,000+: Negotiated

Asset Management Fee. Client shall pay to Adviser an annual fee of [\_\_\_\_\_] of the Net Asset Value (as hereinafter defined) of the Account, based on the market value of securities and cash in the Account (as shown by the quarterly statement) (the “Asset Management Fee”).

For clients who do not use the broker/dealer Interactive Brokers, fees are billed quarterly in arrears based on 1/4 the annual management fee. Fees may be amended at the discretion of Equity Armor Investments. Fees charged are computed based on net asset value (NAV) of assets under management on the last calendar day of the quarter. Before clients are billed the fee calculation is reviewed by the advisor(s) and approved by Brian Stutland before being submitted to the client for approval. Upon EAI's approval the client instructs their respective broker-dealer to issue payment to Equity Armor Investments LLC.

Clients holding their accounts at Interactive Brokers, please select one of the following ways to be billed:

Please check one of the following fee charges:

☐ Client agrees to Automatic Daily Billing:

Interactive Brokers calculates Advisor Fees and deducts these fees based upon annualized percentage of Net Liquidation Value (Net Asset Value) applied on a daily basis rather than on the last calendar day of the quarter. Before clients are billed the fee calculation is reviewed by the advisor(s) and approved by Brian Stutland before being submitted to the client for approval. Upon approval, the client instructs their respective broker-dealer to issue payment to Equity Armor Investments LLC. Equity Armor Investments LLC does not deduct or draft fees from the client's account, but receives payment from Interactive Brokers.

o Client agrees to Automatic Quarterly Billing:

Interactive Brokers calculates Advisor Fees and deducts these fees based upon annualized percentage of Net Liquidation Value (Net Asset Value) applied on a quarterly basis on the last calendar day of the quarter. Before clients are billed the fee calculation is reviewed by the advisor(s) and approved by Brian Stutland before being submitted to the client for approval. Upon approval, the client instructs their respective broker-dealer to issue payment to Equity Armor Investments LLC. Equity Armor Investments LLC does not deduct or draft fees from the client's account, but receives payment from Interactive Brokers.

**Commissions on Accounts**

Commissions' schedules, rates, charges, account fees and all other fees charged by the client designated brokerage firm(s) are the clients' responsibility Equity Armor Investments has no input or control over rates charged at the designated broker/ dealer/ brokerage firm the client chooses. Please be fully aware of all fees and rates for trading of stocks, options, ETF's, fixed income securities and all account fees on your account at other brokerage firms.

**Incentive Fee.** In addition to the Asset Management Fee, Client shall pay the Advisor a fee equal to [\_\_\_\_\_] % of the New Net Profits on all assets in the Account (the "Incentive Fee"). Advisor shall calculate for each calendar quarter the net increase or decrease in "Net Asset Value" between the last day of the prior calendar quarter and the last day of the calendar quarter for which the calculation is made, subtracting any additional contributions to the Account and adding back any withdrawals from the Account during the applicable calendar quarter. Should the calculation of the Net Asset Value result in a decrease in any calendar quarter, such loss shall be carried forward and applied against each ensuing calendar quarter's Net Asset Value until such loss has been completely utilized. The Incentive Fee shall be paid on a quarterly basis as provided in subsection (a) below.

(a)The Net Asset Value of the Account shall be determined as of the close of business on the last business day of each calendar quarter, and the Asset Management Fee and Incentive Fee will be computed and billed as soon as practicable after the end of each calendar quarter. Fees for any partial quarter shall be prorated according to the portion of the quarter in which this Agreement was in effect. Fees are due immediately upon receipt by Client of a bill from Adviser and, unless other arrangements are made, shall be paid by the custodian of the Account out of the assets of the Account. In the event that the payment of fees to Adviser requires the liquidation of securities, Client acknowledges that such redemption will have tax consequences unless the Account is tax deferred.

**Other Compensation**



As described in the examples below, EAI and/or its associated persons (employees and Representatives) may have arrangements where compensation or some other economic benefit is received by EAI or a Representative from a non-client in connection with giving advice to clients.

EAI will usually recommend clients establish custodial accounts with unrelated broker-dealers ("Third Party Custodians"). These firms hold or custody client accounts on their records; process transactions ordered by EAI; provide computer access to EAI for client positions and provide quotes and data needed by EAI for its reports to clients. These firms may also provide the following:

1. **Support Services.** Third Party Custodians also provide EAI with a range of services and other benefits to help it conduct its business. For instance, the firms may pay for or provide EAI with technology solutions to help facilitate its integration with the firms' brokerage systems and thereby streamline its operations. These may include providing duplicate client statements, research related tools, access to block trading, ability to debit fees from client accounts, discounts on compliance, marketing, technology and practice management products provided by third party vendors, and proprietary integrated analysis, trading and reporting system that allows EAI to communicate electronically with these firms. Third Party Custodians' representatives may be available to provide administrative support to EAI. These firms may assist EAI in joining its services platform and in completing documentation to enroll clients to receive its services, and this may include providing or paying for clerical staff to assist and, in some cases, paying account transfer fees or other charges EAI clients may have to pay when changing custodians or service providers.

2. **Reimbursements.** In limited circumstances, Third Party Custodians may make direct or indirect payments to EAI. For example, they may reimburse EAI Representatives for reasonable travel expenses incurred when reviewing that firm's business and practices.

These and other services that a Third Party Custodians may furnish provide benefits to EAI and may be made available at no fee or at a discounted fee and the terms may vary among advisors depending on the business they and their clients conduct and other factors.

A Third Party Custodian's provision of these services and other benefits to EAI may be based on clients of EAI placing a certain amount of assets in accounts with them within a certain period of time. EAI may be influenced by this in recommending that its clients establish accounts with them, and products and services may not necessarily benefit a client's account.

Although a client is not obligated to utilize the services of these firms, EAI believes that use of these firms is a convenient means of obtaining efficient transaction executions, account reference and reporting services for investment positions. However, receipt of such services also creates an inducement and conflict of interest for EAI since referring clients to any other firm may result in higher reporting and overhead costs to EAI.

In some cases, the execution prices from a particular broker/dealer for a particular transaction or set of transactions may not be better, or even be higher, than another broker could provide.

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

We currently do not participate in side-by-side management relationships. Side-by-side management relationships exist where an advisor may have a co-or sub-advisor relationship with another investment advisor to provide services to a common client. However, EAI can develop a type of side-by-side management relationship such that EAI may co- or sub-advise a client already managed by another advisor. Some accounts in a limited number of strategies may be charged with a performance based fee only after the client agrees to such fees and may not exceed 20% of the profits generated and is only applied after a high water mark is breached. Performance based fees are defined above as an "Incentive Fee" and may only be offered to Qualified Clients as defined below.

"Qualified Client" pursuant to SEC Section 205-3 means:

- (i) A natural person who or a company that immediately after entering into the contract has at least \$1,000,000.00 under the management of the investment adviser;
- (ii) A natural person who or a company that the investment adviser entering into the contract (and any person acting on his behalf) reasonably believes, immediately prior to entering into the contract, either:
  - (A) Has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$2,000,000.00 at the time the contract is entered into; or
  - (B) Is a qualified purchases as defined in section 2(a)(51)(AA) of the Investment Company Act of 1940 (15U.S.C. 80a-2(51)(A)) at the time the contract is entered into; or
- (iii) A natural person who immediately prior to entering into the contract is:
  - (A) An executive officer, director, trustee, general partner or person serving in similar capacity, of the investment adviser; or
  - (B) 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.

## **Item 7. Types of Clients**

EAI provides investment supervision services for investment companies, individuals, trusts and estates.

The minimum market value of cash and/or securities to open an account is \$250,000. The minimum may be waived at EAI discretion.

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

EAI offers advice on U.S. stocks (exchange listed and over the counter), futures, warrants, corporate debt, commercial paper, certificates of deposit, municipal securities U.S. Government Securities, option contracts on equities and futures, and partnerships investing in real estate and oil and gas interests. Analysis of the investment ideas includes charting, fundamental, technical and cyclical analysis. Information sources include financial newspapers and magazines, research materials prepared by other corporate rating services, quantitative analysis of equities from Sabrient Systems or similar firms, annual reports, prospectuses, SEC filings and company press releases.

Investment strategies used to implement any investment advice given to clients include long term purchases (securities held at least one year), short term purchases (securities sold within one year), trading (securities sold within thirty days) and option buying and writing (including covered options, uncovered option, overlay, volatility or spreading strategies). Also see Item 4 for descriptions of strategies used.

Investing in securities involves risk of loss that advisory clients should be prepared to bear. EAI does not guarantee the results of any recommendation or action. Losses can occur from receiving services.

#### **Item 9. Disciplinary Information**

EAI has no legal or disciplinary events of a material nature that might impact a client's or prospective client's evaluation of the advisory business's integrity or the integrity of its management.

Stutland Equities LLC, a company in which Brian Stutland is a member, and which conducted a floor trading operation on the Chicago Board Options Exchange, Incorporated (the "Exchange") was the subject of a Decision Accepting Offer of Settlement, more fully described and set forth at the link cited below. Stutland Equities was examined by the Exchange and received a report alleging failures to maintain certain books and records required by the Exchange. After discussion and offer of settlement, Stutland Equities LLC agreed, without admitting or denying the allegations, to the payment of \$25,000 in settlement of the matter, which also included Stutland Equities being approved as fully compliant by the CBOE to its books and records requirements in question.

For additional details and full disclosure of the Settlement matter, please see the Decision Accepting Offer of Settlement below.

<https://www.cboe.org/publish/DisDecision/09-0039.pdf>

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

There are no registrations or applications for registration currently pending to register EAI or any person associated with it as a broker-dealer or registered representative of a broker-dealer, futures commission merchant, or commodity pool operator (or associated person for the foregoing entities). EAI is currently registered with the National Futures Association as a commodity trading advisor.

EAI is owned by 95% Alpha II ZETA, LLC which, in turn, is owned 50% by Brian Stutland and 50% by Afshin Luke Rahbari, and is also owned by 5% Joseph Tigay.

Afshin Luke Rahbari, Senior Investment Officer with EAI, is also a member of the Board of Directors of Trading Block Holdings, Inc., the owner of AOS, Inc. d/b/a TradingBlock. Mr. Rahbari owns an equity interest in Armada Capital, LLC which, in turn, owns 1.66% of TradingBlock Holdings. The time spent on this activity is approximately two to five hours per month. Mr. Stutland's wife is the beneficiary of a trust which has a .88% equity interest in TradingBlock Holdings. TradingBlock also provides office space to EAI within its offices at no charge. Brian Stutland trust has two outstanding loans to Trading Block.

Brian Stutland periodically speaks as a contributor to CNBC network and website. While doing so, he may discuss strategies used or favored by EAI. Mr. Rahbari and Joseph Tigay are occasionally asked to participate as a guest speaker by various media outlets. When giving presentations, they may also discuss strategies used or favored by EAI.

Afshin Luke Rahbari and Brian Stutland are members of Alpha II Zeta, LLC, which is the Manager and sole member of Equity Armor Investments, LLC. Alpha II Zeta is a payroll company and used as a holding company used for investments between Brian Stutland and Luke Rahbari. LBD Capital, LLC, an LLC owned by Rahbari and Stutland, is a member in Sabrient Systems. EAI also has ownership in any advisory created by Sabrient Systems as well. Decisions made by such advisory can be conducted and analyzed independent of strategies used at EAI. EAI is currently in a legal dispute with Sabrient Systems and First Trust Porfolios.

Sabrient Systems is a quantitative research analytics group that produces a stock ranking system based on fundamental analysis, analyst estimates, etc. Sabrient Systems provides EAI with free research from its stock ranking system that may or may not be used to determine which stocks to purchase for our clients. This ownership, business and engagement relationships may result in conflicts of interest, and clients are hereby notified of the existence of these conflicts. When making investment decisions for clients, EAI and its Representatives act in the best interest of clients.

EAI does not recommend or select other investment advisers for clients, thus does not receive any direct or indirect compensation for such actions.

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

Representatives of EAI may buy or sell securities, for themselves that they also recommend to clients. Where a transaction for a Representative, or an account related to a Representative, is contemplated, a client's transaction is given priority or sent at equal times as the Representative. EAI has developed a Code of Ethics applicable to all persons who have access to confidential client records or to recommendations being made for client accounts. Designed to prevent conflicts of interest between the financial interests of clients and the interests of the firm and its staff, the Code requires, among other procedures, persons who have access to client records or firm recommendations to obtain preapproval of certain securities transactions, to report transactions quarterly and to report all securities positions in which they have a beneficial interest at least annually. These reporting requirements allow supervisors at the firm to determine whether to allow or prohibit certain securities purchases and sales based on transactions made, or anticipated to be made, in the same securities for clients' accounts. The Code also established certain bookkeeping requirements relating to state reporting rules. The Code is required to be reviewed annually and updated as necessary.

A complete copy of the firm's Code is available upon request, either in writing or by phone.

#### **Item 12. Brokerage Practices**

We may place orders to purchase and sell investments through each client's broker(s) or dealer(s). In selecting among client's broker(s) or dealer(s) for any transaction or series of transactions, we may consider a number of factors including, for example, net price, reputation, financial strength and stability, efficiency of the trade executions EAI receives, block trading and block positioning capabilities, willingness to execute related or unrelated difficult transactions, and other matters ordinarily involved in the receipt of brokerage service generally. We may cause client accounts to pay higher commissions to a broker or dealer that provides brokerage or research services to us if the we determine in good faith that the amount of such commission is reasonable in relation to the value of the brokerage or research services provided by such executing broker or dealer viewed in terms of particular transaction(s) or our overall responsibilities to client accounts. When referring clients to dealers, we will only refer clients to dealers registered in states where the clients reside.

Clients should be aware that we may aggregate sale and purchase orders of securities held in the account with similar orders being made simultaneously for other accounts managed by the firm for accounts of the affiliates of EAI, if, in our judgment, such aggregation results in an overall economic benefit to the account based on an evaluation that the account is benefited by relatively better purchase or sale prices, lower commission expenses, and beneficial timing of transactions, or a combination of such factors.

#### **Item 13. Review of Accounts**

Each account will be reviewed monthly by the Investment Committee with respect to all cash and security transactions. Each account will also be reviewed to ensure activity is consistent with account objectives.

Investment Committee:

Investment Officer: Brian Stutland

Investment Officer: Afshin Luke Rahbari

Client reports will be generated by the client's account custodian either monthly or quarterly, per client request, showing all account activity and investment values, as well as a list of all assets. For accounts custodied at Interactive Brokers, LLC, reports are made available on-line weekly. In addition, an annual summary of the above reports is generated.

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

Other than described in Items 5, Other Compensation and Item 10, Affiliations, EAI and its Representatives do not receive cash or any economic benefit (including commission, equipment, or non-research services) from non-clients in connection with giving advice to clients.

We do not, either directly or indirectly, compensate any person for client referrals but may do so (with advance disclosure to clients) in the future.

#### **Item 15. Custody**

EAI does not have custody of client funds or securities. All client assets are held through Trading Block, Inc., Charles Schwab, Fidelity, or Interactive Brokers, as the client selects. All confirmations and account statements will be generated and sent from the client's selected brokerage firm. Clients should carefully review all confirmations and account statements to ensure the information and billings they may receive from EAI are consistent with the information on those statements.

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

Authority of Our Firm:

We have discretionary authority to manage and control the assets in each client's account. This authority is granted to us when a client signs our discretionary management agreement. This authority allows us to select and purchase and sell securities in the amounts and at the times we believe are in the best interest of the account. Investment Limitations and Guidelines:

EAI manages investments in accordance with the client's investment objective, policies and restrictions. A client may, from time to time, revise, supplement, or otherwise modify the guidelines by specifying such revision, supplement, or amendment in writing to the firm; provided, however, that no such revision, supplement, or modification shall be effective until written notice thereof is received by the firm.

#### **17. Voting Client Securities**

Unless otherwise requested in writing by the client, we shall not take any action with respect to the voting proxies solicited by any person with respect to any investment of client assets. We will advise the client on the issues presented in such proxies, if so requested by the client to do so.

#### **Item 18. Financial Information**

We do not have custody of client's funds or securities, or require or solicit fee payments from clients of more than \$500.00 per client, six months or more in advance.

#### **Item 19. State Information**

A. Identify each of your principal executive officer and management person

Brian Stutland:

Chief Compliance Officer and Chief Investment Officer and Manager

Luke Rahbari:

Chief Risk Officer and Manager

Joseph Tigay:

Member

See attached Schedules 2B for information about key managers.

- B. Describe any business in which you are actively engaged
  - a. For your convenience find a copy of the instructions to with items used as a cross reference to Item 19 and to Part 2B of Form ADV.
- C. Performance based fees
  - a. For your convenience please refer to Item 5 and Item 6
- D. Disclosure of all material facts
  - a. No management person has been involved in a disciplinary action other than described in Item 9.
- E. Relationships or arrangements with any issuer of securities
  - a. None

The firm is not engaged in any business other than giving advice

**Item 1 Cover Page**

SCHEDULE B BROCHURE SUPPLEMENT

Afshin Luke Rahbari

Equity Armor Investments, LLC

311 S. Wacker Dr., Suite 650

Chicago, Illinois 60606

February 20,  
2015

This brochure supplement provides information about Afshin Luke Rahbari that supplements Equity Armor Investments, LLC brochure. You should have received a copy of that brochure. Please contact Brian Stutland, Chief Compliance Officer, if you did not receive Equity Armor Investments, LLC brochure, or have any questions about the contents of this supplement.

Registration does not imply a certain level of skill or training.

Additional information about Afshin Luke Rahbari also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and at [www.stutland.com](http://www.stutland.com) or at [www.equityarmorinvestments.com](http://www.equityarmorinvestments.com).



## **Item 2. Educational Background and Business Experience**

Name: Afshin Luke Rahbari Date of Birth: 1967

Formal Education after High School:

1985-1991 Eastern Michigan-Ypsilanti, MI

Degree: BBA

Major: Economics

2000-2002 University of Chicago, Graduate School of Business -Chicago, Illinois

Degree: Master of Business Administration

Business Background:

1994 to 2002- LETCO Trading- Chicago, Illinois

Investment Securities Business

Position: Floor Trader, Market Maker, Specialist

Registered Options Principal

2002 to 2006 Toronto Dominion Bank-London

Trading Company

Institutional Equity Derivatives Desk

2007 to 2011- Peachtree Asset Management

Asset Manager-Peachtree Settlement Funding

2011-present Equity Armor Investments, LLC - Chicago, IL  
Investment Securities Business

Position: Founder, Member, Investment Adviser Representative

## **Item 3. Disciplinary Information**

Mr. Rahbari has had no legal or disciplinary events of any kind.

#### **Item 4. Other Business Activities**

- 1) Trading Block – Luke Rahbari is a board member and owns roughly 1% equity in the company via preferred shares.
- 2) ADSI – hold stock certificate but the company equity value is practically worthless
- 3) Life Seat – Luke Rahbari made \$50,000 investment in 2007. Have not received financials or K-1 for a few years because basically it has gone under. Have not had communication with the firm for an extended period of time
- 4) LBD Capital, LLC – Luke Rahbari made \$60,000 investment for 55% membership and equal manager in the partnership company whose sole purpose was to invest \$110,000 in Sabrient Systems for 2.75% membership in Sabrient Systems
- 5) Sabrient Systems – Equity Armor Investments made a partnership agreement with the company to receive 50% as fees of an asset manager. EAI has not received any fees and litigation is pending to determine the extent of fees owed.

Sabrient Systems is a quantitative research analytics group that produces a stock ranking system based on fundamental analysis, analyst estimates, etc. Equity Armor Investments might use public displayed information about Sabrient's stock selection to maybe or maybe not be used to determine which stocks to purchase for clients.

The relationships above have not resulted in a conflict of interest, but should such a conflict arise, advisors would immediately notify the proper supervising parties and take the necessary action to disclose the potential or existence of a conflict and respond appropriately to remedy any conflict.

#### **Item 5. Additional Compensation**

Afshin Luke Rahbari, does not receive additional compensation for advisory services on behalf of Equity Armor Investments LLC.

#### **Item 6. Supervision**

Brian Stutland will serve as investment adviser principal for Equity Armor Investments LLC and supervises all of its actions along with those of Mr. Rahbari.

#### **Item 7. Requirements for State-Registered Advisers**

A. With respect to Mr. Rahbari:

1. There are no awards or findings of liability in arbitration or other claim.

2. There are no awards or findings of liability in a civil, self-regulatory organization, or administrative proceeding.
- B. Mr. Rahbari, is not subject of a bankruptcy petition.

**Item 1. Cover Page**

SCHEDULE B BROCHURE SUPPLEMENT

Joseph Tigay

Equity Armor Investments, LLC

311 S. Wacker Dr., Suite 650

Chicago, Illinois 60606

February 20, 2015

This brochure supplement provides information about Joseph Tigay that supplements Equity Armor Investments, LLC brochure. You should have received a copy of that brochure. Please contact Brian Stutland, Chief Compliance Officer, if you did not receive Equity Armor Investments, LLC brochure, or have any questions about the contents of this supplement.

Registration does not imply a certain level of skill or training.

Additional information about Joe Tigay also is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and at [www.stutland.com](http://www.stutland.com) or at [www.equityarmorinvestments.com](http://www.equityarmorinvestments.com).

## **Item 2. Educational Background and Business Experience**

Name: Joseph Tigay Date of Birth: 1981

Formal Education after High School:

2000-2009 Michigan State University-East Lansing, Michigan

Degree: Bachelor of Science in Economics

Major: Economics

Business Background:

2005-to 2009 - Stutland Equities, LLC- Chicago, Illinois

Investment Securities Business

Position: Trader, Market Maker,  
Clerk

2010 to 2011 - Stutland Equities, LLC- Chicago, Illinois

Investment Securities Business

Position: Floor Trader, VIX options Market Maker,

2011to present - Equity Armor Investments, LLC- Chicago, Illinois

Investment Securities Business

Position: Investment Adviser Representative

## **Item 3. Disciplinary Information**

Mr. Tigay has no legal or disciplinary events of any kind.

## **Item 4. Other Business Activities**

Joseph Tigay has no other outside business activity.

The relationships above have not resulted in a conflict of interest, but should such a conflict arise, advisors would immediately notify the proper supervising parties and take the necessary action to disclose the potential or existence of a conflict and respond appropriately to remedy any conflict

## **Item 5. Additional Compensation**

Joseph Tigay does not receive additional compensation for advisory services on behalf of Equity Armor Investments LLC.

**Item 6. Supervision**

Brian Stutland is the investment adviser principal for Equity Armor Investments LLC and supervises all of its actions, including Mr. Tigay's business activities.

**Item 7. Requirements for State-Registered Advisers**

- A. With Respect to Mr. Tigay:
  - 1. There are no awards or findings of liability in arbitration or other claim.
  - 2. There are no awards or findings of liability in a civil, self-regulatory organization, or administrative proceeding.
- B. Mr. Tigay is not subject of a bankruptcy petition.

SCHEDULE B BROCHURE SUPPLEMENT

Brian Stutland  
Equity Armor Investments, LLC

311 S. Wacker Dr., Suite  
650  
Chicago, Illinois 60606

February 20, 2015

This brochure supplement provides information about Brian Stutland that supplements Equity Armor Investments, LLC Brochure. You should have received a copy of that brochure. Please contact Brian Stutland, Chief Compliance Officer, if you did not receive Equity Armor Investments, LLC brochure, or have any questions about the contents of this supplement.

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Additional information about Brian Stutland also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and at [www.stutland.com](http://www.stutland.com) or at [www.equityarmorinvestments.com](http://www.equityarmorinvestments.com).

## **Item 2. Educational Background and Business Experience**

Name: Brian Stutland

Date of Birth: 1975

Formal Education after High School:

1993-1997 University of Michigan- Ann Arbor, Michigan Degree: Bachelor of

Science in Engineering Major: Chemical Engineering

1997-1999 University of Michigan- Ann Arbor, Michigan Degree:

Masters of Science in Engineering Major: Biomedical Engineering

Business Background:

1999-to 2002 LETCO Trading- Chicago, Illinois

Investment Securities Business

Position: Trader, Market Maker

2002 to 2005 - Brian Stutland sole proprietor trading activity- Chicago, Illinois

Investment Securities Business

Position: Floor Trader, Founder

2005 to 2011 - Stutland Equities, LLC- Chicago, Illinois

Investment Securities Business

Position: Floor Trader, Founder & President

2012 to 2014 - Stutland Equities, LLC- Chicago, Illinois

Investment Securities Business

Position: Floor Trader, Founder & Member

2011 to present- Equity Armor Investments, LLC

Investment Securities Business

Position: Founder,

### **Item 3. Disciplinary Information**

Equity Armor Investments LLC has no legal or disciplinary events of a material nature that might impact a client's or prospective client's evaluation of the advisory business's integrity or the integrity of its management.

Stutland Equities LLC, a company in which Brian Stutland is a member, and which conducted a floor trading operation on the Chicago Board Options Exchange, Incorporated (the "Exchange") was the subject of a Decision Accepting Offer of Settlement, more fully described and set forth at the link cited below. Stutland Equities was examined by the Exchange and received a report alleging failures to maintain certain books and records required by the Exchange. After discussion and offer of settlement, Stutland Equities LLC agreed, without admitting or denying the allegations, to the payment of \$25,000 in settlement of the matter, which also included Stutland Equities being approved as fully compliant by the CBOE to its books and records requirements in question.

For additional details and full disclosure of the Settlement matter, please see the Decision Accepting Offer of Settlement.

<https://www.cboe.org/publish/DisDecision/09-0039.pdf>

### **Item 4. Other Business Activities**

- 1) Trading Block – Brian Stutland has made \$400,000 in loans to the company
- 2) Trading Block – Donielle Stutland owns less than 1% equity as a preferred shareholder
- 3) Scripted Edge – private placement in private LP for \$200,000 investment to become a 20% equity owner of the company (no involvement in daily operations of the business)
- 4) LBD Capital, LLC – Brian Stutland made \$50,000 investment for 45% membership and equal manager in the partnership company whose sole purpose was to invest \$110,000 in Sabrient Systems for 2.75% membership in Sabrient Systems
- 5) Donielle Stutland and Brian Stutland made private placement in multiple LLCs whose sole purpose is to own and rent properties in Chicago and Denver markets. (no involvement in daily operations).
- 6) Sabrient Systems – Equity Armor Investments made a partnership agreement with the company to receive 50% as fees of an asset manager. EAI has not received any fees and litigation is pending to determine the extent of fees owed.

Sabrient Systems is a quantitative research analytics group that produces a stock ranking system



based on fundamental analysis, analyst estimates, etc. Equity Armor Investments might use public displayed information about Sabrient's stock selection to maybe or maybe not be used to determine which stocks to purchase for clients.

The relationships above have not resulted in a conflict of interest, but should such a conflict arise, advisors would immediately notify the proper supervising parties and take the necessary action to disclose the potential or existence of a conflict and respond appropriately to remedy any conflict.

#### **Item 5. Additional Compensation**

Brian Stutland does not receive additional compensation for advisory services on behalf of Equity Armor Investments LLC.

#### **Item 6. Supervision**

Brian Stutland serves as investment adviser principal for Equity Armor Investments, LLC and supervises all of its actions. Mr. Stutland's activities are supervised by Luke Rahbari.

#### **Item 7. Requirements for State-Registered Advisers**

- A. With respect to Mr. Stutland:
  - 1. There are no awards or findings of liability in an arbitration or other claim.
  - 2. There are no awards or findings of liability in a civil, self-regulatory organization, or administrative proceeding other than the item set forth in Item 3 above.
- B. Mr. Stutland is not subject of a bankruptcy petition.

