

Item 1 Cover Page

December 31, 2023

Posto Asset Management, LLC

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Part 2A of Form ADV (the “Brochure”) provides information about the qualifications and business practices of Posto Asset Management, LLC (“PAM”). If you have any questions about the contents of this Brochure, please contact us by phone at (305) 930-3890 and/or by email at dv@postoassetmanagement.com. 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.

Posto Asset Management, LLC is a registered investment adviser with the State of Florida; however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.

Additional information about Posto Asset Management LLC also is available on the SEC’s website at www.adviserinfo.sec.gov . Our Firm’s CRD number is 299489.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

- *Company website and contact email information updated with new portal: May 13, 2022.*
- *Privacy Statement added to section 12.C - December 31st, 2023*

Pursuant to federal regulations, PAM will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of PAM's fiscal year, along with a copy of this Brochure or an offer to provide the Brochure.

Whenever you would like to receive a complete copy of our Firm Brochure Part 2A and Part 2B (detailed information regarding the Firm's Partners and Employees), please contact us at 305-930-3890 or visit our website. PAM's Brochure is also available anytime at the SEC's website at www.adviserinfo.sec.gov.

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Item 4 Advisory Business

Description of Firm

Posto Asset Management LLC ("PAM") is a registered investment adviser primarily based in Miami Beach, Florida. We are organized as a limited liability company ("LLC") under the laws of the State of Florida. We have been providing investment advisory services since 2019. Dan Victor, CFA is PAM's principal and the Chief Investment Officer and Chief Compliance Officer.

The following paragraphs describe our services and fees. Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we," "our," and "us" refer to Posto Asset Management LLC and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

A. Types of Advisory Services Offered

Asset Management

Asset Management - PAM provides investment advisory services, also known as asset management Services or financial planning, usually on a discretionary basis to individuals, organizations, trusts, Traditional IRA, self-employed, PCRA, Rollover IRA, SEP IRA, Roth IRA, and Non-deductible IRAs. Whether you need the full suite of investment advisory services we offer, or only some, you will sign one agreement that will specify those services for which you are engaging us and the fee you pay will be negotiated on that basis as either a percentage of the assets we manage or a flat fee. See the Fees and Compensation section below for more details.

In addition to monthly statements provided to the client by the custodian, PAM provides quarterly client performance reports, either by mail or electronically. PAM also provides monthly blog posts and a market commentary in a quarterly newsletter, the "Posto Market Report".

1. Financial Planning Services

PAM's financial planning services are provided to individuals and range from constructing a comprehensive investment policy statement "IPS" to more focused consultations, depending on the needs of each client. The process of constructing an IPS begins with identifying the clients desired and required returns in conjunction with the individuals risk tolerance. In the end, the IPS presents a return objective that is attainable given the portfolio's risk constraints. Constraints considered encompass liquidity needs, investment time horizon, tax and legal situation, along with any unique circumstance. The process combines a quantitative structure in a holistic approach.

Clients have the option of utilizing PAM to implement certain investment recommendations but are under no obligation to do so. Advice and recommendations may also be given on non-securities matters and any implementation of PAM's recommendations is entirely at the client's discretion. Clients are free at all times to accept or reject any or all recommendations made by PAM and clients retain the authority and discretion on whether or not to implement any recommendations.

Clients should understand that a potential conflict of interest exists if PAM recommends its own investment management services. Financial planning recommendations are based on the client's financial situation at the time the recommendations are provided and are based on the information provided by the client. In addition, certain assumptions may be made with respect to interest and inflation rates, use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance and we cannot offer any guarantees or promises that the client's financial goals and objectives will be met. As a client's financial situation, goals, objectives, or needs change, the client is urged to promptly notify PAM. For more information on the risks associated with investing, please refer to Item 8, below.

2. Portfolio Management for individuals and/or small businesses

We offer discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

We may also offer non-discretionary portfolio management services. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

We will regularly monitor the performance of your accounts.

3. Publication of periodicals or newsletters

Posto Asset Management may offer a subscription-based service to an informational newsletter at a monthly fee. The publication is distributed with priority to clients and prospective clients of free of charge.

4. Publication of periodicals or newsletters

Posto Asset Management offers a subscription-based service to its newsletter at a monthly fee. The publication would be distributed with priority to clients and prospective clients of Posto Asset Management free of charge.

5. Educational seminar/ workshops

Posto Asset Management may occasionally offer educational and informational type seminars that will be open to the general public at a yet to be determined fee.

B. Important Information Relating to PAM's Services

1. Information Received by Individual Clients

At the onset of the client relationship, PAM gathers information on each client's investment objectives, risk tolerance, time horizons, tax status, liquidity requirements, and any other information deemed necessary to assist PAM in providing its investment management services ("Investment Guidelines").

PAM does not assume responsibility for the accuracy of the information provided by the client and is not obligated to verify any information received from the client or from any of the client's other professionals (e.g., attorney, accountant, etc.). Under all circumstances, clients are responsible for promptly notifying PAM in writing of any material changes to the client's Investment Guidelines. In the event that a client notifies us of changes, we will review such changes and implement any necessary revisions to the client's portfolio.

Clients may impose reasonable guidelines and/or restrictions on investing their assets. For example, a client may specify that the investment in a particular stock (or derivative of such stock) is prohibited or that specific investments should not exceed a set percentage of the value of the portfolio. All such guidelines and restrictions must be communicated to PAM in writing. There may be times, however, when

certain restrictions are placed by a client, which prevents us from accepting or continuing to manage the account. PAM reserves the right to not accept and/or terminate management of a client's account if it feels that the client-imposed restrictions would limit or prevent it from carrying out its investment strategies.

2. Client Agreements and Disclosures

Each client is required to enter into a written agreement with PAM setting forth the terms and conditions under which the firm shall render its services (the "Agreement"). In accordance with applicable laws and regulations, PAM will provide its disclosure brochure (ADV Part 2A) and brochure supplement (ADV Part 2B) to each client prior to or contemporaneously with the execution of the Agreement. The Agreement between PAM and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. PAM's annual fee shall be prorated through the date of termination and any remaining balance shall be charged or refunded to the client, as appropriate, in a timely manner.

Neither PAM nor the client may assign the Agreement without the consent of the other party. Transactions that do not result in a change of actual control or management of PAM shall not be considered an assignment.

PAM will provide investment advisory services but will not provide custodial or other administrative services. At no time will PAM accept or maintain custody of a client's funds or securities. Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer, unless otherwise negotiated.

C. Assets Under Management

PAM has under \$1 million in assets under management as of the date of this Brochure in the State of Florida as an investment advisor.

D. Participation in Wrap Programs

PAM does not participate in any wrap programs.

Item 5 Fees and Compensation

As described in greater detail below, Posto Asset Management charges different types of fees, including fees based on a percentage of assets under management, fixed fees, and hourly fees. The specific fees charged by PAM for its financial planning and investment management services will be set forth in each client's Agreement.

Fees may be negotiable under certain circumstances. In addition, PAM has full discretion to waive its advisory fees in their entirety. Although PAM believes its advisory fees are competitive, clients should be aware that lower fees for comparable services may be available from other sources.

A. Description of Fees; Fee Schedule

1. Fees Based on a Percentage of Assets Under Management

For investment management services, PAM generally charges an annual management fee ranging from 0.70% to 2.0% of a client's assets under management. The specific fee charge is usually dependent upon the complexity of the client's investment strategy and amount of account assets. PAM's investment advisory fees are assessed quarterly in advance and calculated as of the close of business on the last business day of the calendar quarter.

Should a client open an account during the quarter, management fees will be prorated for assets managed for a partial quarter based on the number of days remaining in the quarter. In the event that PAM's

services are terminated mid-quarter, the annual fee shall be prorated through the date of termination as defined in the Agreement and any pre-paid unearned fees will be promptly refunded to the client.

Payment for PAM's investment management fees will be deducted from each client's account on a quarterly basis by their custodian and paid directly to us, unless otherwise directed in writing by a client. The consent for deduction of fees is generally contained in the Agreement. Clients' custodians will deliver a periodic (at least quarterly) account statement directly to clients, which will include all transactions that took place in the account during the period covered and reflect any fees deducted and paid to us.

2. Fixed and Hourly Fees

PAM may charge a negotiable fixed fee for its investment consulting services, which ranges from a pre-determined fixed amount for or an hourly fee which ranges from at \$100-\$500 per hour depending on the scope of the arrangement. The agreed upon fee will be billed to the client monthly, with the first month's fee to be paid in advance and the remainder billed monthly in arrears. Upon termination, any prepaid unearned fees will be promptly refunded to the client.

B. Other Fees and Expenses

Clients should understand that the advisory fees described in the sections above do not include certain charges imposed by third parties such as custodial fees and transaction costs. Client assets may also be subject to retirement plan administration fees (if applicable), transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Clients should further understand that these fees and any other charges, fees and commissions incurred in connection with transactions for a client's account will generally be paid out of the assets in the account. Please refer to Item 12 of this Brochure entitled "Brokerage Practices" for additional important information about the brokerage and transactional practices of PAM.

Client assets invested in mutual funds may be subject to certain fees and expenses imposed directly by mutual funds to their shareholders, which shall be described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, including but not limited to deferred sales charges and/or 12b-1 fees.

The fees and expenses referenced above are separate from and in addition to the fees charged by PAM. Accordingly, clients should review all fees associated with their account, together with the fees charged by PAM, to fully evaluate and understand the total amount of fees to be paid by the client.

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

Posto Asset Management chooses not to use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry an unnecessary degree of risk to the client.

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Item 7 Types of Clients

Posto Asset Management provides financial planning and investment management services to individuals and institutional clients. PAM requires a minimum initial investment of \$100,000 to open an investment management account, or group of related accounts. Account minimums and related fees may be negotiated and or waived at our sole discretion.

Prior to engaging PAM to provide any of the services described in this Brochure, the client will be required to enter into a written agreement with us setting forth the terms and conditions under which we shall render our services. PAM reserves the right to accept or decline a potential client for any reason in our sole discretion.

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

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. The selection and or recommendation of any investment is made in the context of a well-diversified portfolio with the consideration of the investors' return and risk objective

We glean our information from a number of sources including direct company contact, regulatory filings and filings with the SEC, conferences, webinars, financial newspapers and magazines, inspection of corporate activities, research material prepared by others, annual reports, prospectuses, corporate rating services and company press releases. Additional sources of research information may include but are not limited to trade journals, discussions and meetings with security analysts, internal and external research reports, statistical analysis and material and interviews with outside consultants and, analysts and personal assessment of financial consequences of world events derived from general or specific material depending on the particular circumstances.

The nature of the research services provided by the primary broker is supplemental to PAM's internal research capacity. Research services furnished by a broker through which PAM effects transactions are used to the benefit of all its clients and not solely for the benefit of the particular client whose transactions were affected by the providing broker. Other sources of information that PAM may use include online financial data service providers and industry conferences.

Investment Strategies

PAM employs a range of investment strategies to implement the advice we give to clients including long-term purchases, short-term purchases, trading, short sales, margin transactions, option strategies including writing covered options. PAM offers discretionary advice on the following:

- Equity Securities
- Securities traded over the counter
- Foreign issuers (ADRs, EDRs and GDRs)
- Warrant
- Rights
- Restricted Shares
- Commercial paper
- U. S. Corporate Debt and non-dollar bonds
- United States Government securities
- Certificates of deposit
- Municipal securities
- Mutual fund shares
- Interests in partnerships
- Structured Notes
- Option contracts on securities and commodities
- Futures contracts on tangibles
- Exchange Traded Funds (ETF)
- Preferred Stock

As financial markets and products evolve, PAM may invest in other instruments or securities, whether currently existing or developed in the future, when consistent or appropriate.

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, but the intent is to be appropriate for the stated time horizon. Each client executes an Investment Advisory Agreement that documents their objectives and their desired investment strategy appropriate for a specific portfolio.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach, which, as well as domestic stocks, bonds and mutual funds, includes options, ETF's and international stocks, bonds and mutual funds, constantly keeps the risk of loss in mind.

Investors face the following investment risks:

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

Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market risks.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar in the future, 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.

Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

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 generally are less liquid.

Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9 Disciplinary Information*Legal and Disciplinary*

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10 Other Financial Industry Activities and Affiliations

Affiliations

Posto Asset Management strives to avoid potential conflicts of interest.

More specifically the Firm and its employees:

- Are not registered as a broker-dealer
- Are not affiliated as a registered representative or associated person of a broker dealer or other entity.
- Do not have economic relationships or arrangements with any other related persons or entities that are material to its advisory business.

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

A. Description of Our Code of Ethics

As a fiduciary, Posto Asset Management maintains an on-going commitment to act solely in the best interest of its clients. The employees of PAM have committed to a Code of Ethics.

The key components include:

- Clients will be placed ahead of the Firm's or any employee's own investment interests
- Employees are expected to conduct themselves with the utmost integrity
- Employees will not take inappropriate advantage of the position with the Firm
- Employees are expected to conduct their personal securities transactions in accordance with the Personal Securities Transactions section on the Code of Ethics
- Employees are expected to exercise due diligence and care in maintaining and protecting its clients non-public and confidential information
- Employees are expected to comply with federal and applicable state securities laws and to promptly report violations to the Firm's Chief Compliance Officer
- Employees not in observance of the Code of Ethics will be subject to disciplinary action

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Prohibition on Use of Insider Information

PAM has adopted policies and procedures to prevent the misuse of "insider" information (material, non-public information). A copy of such policies and procedures is available to any person upon request.

Participation or Interest in Client Transactions

PAM and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades.

Item 12 Brokerage Practices

A. Selection Criteria

Except in limited situations where Posto Asset Management permits clients to direct brokerage (as described below), PAM will require clients to use Interactive Brokers, LLC, as their custodian. As part of the services provided under the custodial arrangement, Interactive Brokers will generally not charge custodial fees to a client as long as the account's transactions are placed with Interactive Brokers for execution. Interactive Brokers charges a transaction fee per transaction for each client account. All Interactive Brokers fees and charges are fully disclosed on the account statements sent by Interactive Broker to each client. The commissions and/or transaction fees charged by Interactive Brokers may be higher or lower than those charged by other financial institutions.

Factors considered by us in selecting Interactive Brokers as custodian for client accounts are based on, but not limited to the reasonableness of transaction fees charged, product availability, quality of executions, research and other services available to both the client and us.

While there is no direct link between the investment advice given to clients and our requiring clients to use the custodial services of Interactive Brokers, certain benefits are received by us due to this arrangement. Please refer to Item 12B and item 14B below for a detailed description of the services and benefits received by us.

There may be times, however, when we evaluate and use an alternative broker-dealer for certain individual transactions, if in our discretion we believe that best execution for such individual transactions could be achieved outside of the client's custodian.

B. Best Execution

It is the policy and practice of PAM to strive for the best price and execution that are competitive in relation to the value of the transaction ("best execution"). In order to achieve best execution, PAM will use its best judgment to choose the broker-dealer most capable of providing the brokerage services necessary to obtain the best overall qualitative execution. Although PAM will strive to achieve the best execution possible for client securities transactions, this does not require it to solicit competitive bids and PAM does not have an obligation to seek the lowest available commission cost. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the overall best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among other things, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while PAM will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions. PAM is not required to negotiate commission rates; thus the client may be deemed to be paying for research and related services provided by the broker which are included in the commission rate.

To help ensure that clients are receiving best execution, PAM will periodically (and no less often than annually) evaluate the execution quality, trading process and services provided by Interactive Brokers. PAM's evaluation will consider the full range of brokerage services offered by Interactive Brokers, which may include, but is not limited to price, commission, timing, research, aggregated trades, capable floor brokers or traders, competent block trading coverage, ability to position, capital strength and stability, reliable and accurate communications and settlement processing, use of automation, knowledge of other buyers or sellers and administrative ability.

C. Privacy Statement

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. Our Privacy Policy is available upon request.

Item 13 Review of Accounts

The portfolio manager will monitor your accounts on an ongoing basis and will conduct account reviews at least annually, to ensure the advisory services provided to you are consistent with your investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

You will receive trade confirmations and monthly or quarterly statements from your account custodian. While reviews and updates to the financial plan are not part of the contracted services, at your request we will review your financial plan to determine if the investment advice provided is consistent with your investment needs and objectives. We will also update the financial plan at your request. At our sole discretion, reviews and updates may be subject to our then current hourly rate. If you implement the financial planning advice provided by our firm, you will receive trade confirmations and monthly or quarterly statements from relevant custodians.

Item 14 Client Referrals and Other Compensation

Currently, Posto Asset Management does not have any solicitation or referral arrangements in place. PAM does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to us.

Item 15 Custody

Under state regulations, Posto Asset Management is deemed to have custody of client funds or securities by reason of the fact that PAM has authority to debit its fees directly from the client's account. Custody of account assets will be maintained with an independent qualified custodian. As mentioned above, PAM requires Interactive Brokers to serve as custodian. Therefore, clients should thoroughly consider the differences between having their assets held at a broker-dealer versus at a bank or trust company. Some of these differences include, but are not limited to, custodian costs, trading issues, security of assets, client reporting and technology.

Clients will receive statements on at least a quarterly basis directly from the qualified custodian that holds and maintains their assets. Clients are urged to carefully review all custodial statements and compare them to any account reports provided by PAM. PAM reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Please refer to Item 12 for additional disclosure information relating to practices and relationships with custodians.

Under state regulations, advisers with custody are generally required to undergo an independent verification of the assets for which the adviser has custody through an annual surprise examination by an independent certified public accountant. Advisers deemed to have custody solely as a consequence of the authority to debit fees directly from client accounts are not required to obtain an independent verification of those client funds and securities maintained by a qualified custodian so long as certain steps are followed, including providing each client with a copy of the invoice that includes the fee and information on how it was calculated. Clients should understand that it is their responsibility to ensure that the fee calculation is correct, and not the custodian.

Item 16 Investment Discretion

A. Discretionary Authority; Limitations

For clients receiving investment management services, Posto Asset Management has full investment discretion over (1) which securities are to be bought or sold in client accounts; (2) the amount of securities to be bought or sold in client accounts; and (3) when transactions are made. This means that PAM does not have to obtain prior consent from the client when investing client assets. However, such discretion is to be exercised in a manner consistent with each client's stated investment objectives, risk tolerance, and time horizon. In addition, PAM's authority to trade securities may be limited in certain circumstances by applicable legal and regulatory requirements. In some instances, PAM's discretionary authority may be limited by conditions imposed by clients on PAM's discretionary authority, including restrictions on investing in certain securities or types of securities. All such limitations, restrictions, and investment guidelines must be provided to PAM in writing.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

B. Limited Power of Attorney

By signing PAM's Agreement, clients authorize PAM to exercise this full discretionary authority with respect to all investment transactions involving the client's investment management account. Pursuant to such Agreement, PAM is designated as the client's attorney-in-fact with discretionary authority to effect investment transactions in the client's account which authorizes PAM to give instructions to third parties in furtherance of such authority.

Item 17 Voting *Client* Securities

Posto Asset Management's policy and practice is to not vote proxies on behalf of its clients and therefore, shall have no obligation or authority to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held in a client's account, unless the account is an ERISA account and such authority has not been delegated to another named fiduciary in the plan's written documents. Consequently, the client retains the responsibility for receiving and voting all proxies for securities held within the client's account. PAM shall not be deemed to have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client.

PAM does not advise or act for clients with respect to any legal matters.

Item 18 Financial Information

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you.

We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$500 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

Item 19 Requirements for State-Registered Advisers

A. Principal Executive Officers and Management Persons

Please refer to Posto Asset Management's supplemental brochure (Form ADV Part 2B) for information concerning the formal education and business background for PAM's principal.

B. Other Business Activities

None. PAM and our Associated Persons do not have any other outside business activities.

C. Performance-Based Fees

Not Applicable. PAM does not charge performance-based fees.

D. Disciplinary or Legal Events

PAM and our Associated Persons do not have any disciplinary or legal events to disclose.

E. Relationships or Arrangements with Issuers of Securities

None. Neither PAM nor any of its management persons have any relationships or arrangements with any issuer of securities.

F. Disclosure of Material Conflicts of Interest

None. Material conflicts of interest relating to PAM, its representatives and employees, which would be reasonably expected to impair the rendering of unbiased and objective advice, have been disclosed herein.

BROCHURE SUPPLEMENT
(Form ADV Part 2B)

ITEM 1: COVER PAGE

Dan Victor, CFA

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May 17, 2024

This brochure supplement provides information about Dan Victor that supplements Posto Asset Management's Disclosure Brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact our Chief Compliance Officer at (305-930-3890) if you did not receive Posto Asset Management's Disclosure Brochure or if you have any questions about the contents of this supplement. Thank you.

Additional information about Dan Victor is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Dan Victor

Year of Birth: 1986

Educational Background

- Boston University, Bachelor of Arts – Economics (2008)
- Fundacao Getulio Vargas, M.B.A – Finance (2012)

Business Background

- Posto Asset Management LLC, Principal and Chief Executive Officer (2019 to Present)
- Sumitomo Mitsui Trust Bank Limited, New York, Assistant Vice President, (2015 –2018)
- IHS Markit Group, New York, Assistant Vice President (2013 – 2015)

Certifications: **CFA**

The Chartered Financial Analyst (CFA) and Certification Mark (collectively, the "CFA marks") are professional certification marks granted in the United States and internationally by the CFA Institute. Mr. Victor became a CFA Charterholder in 2017.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards - The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to: 1) Place their clients' interests ahead of their own; 2) Maintain independence and objectivity; 3) Act with integrity; 4) Maintain and improve their professional competence; 5) Disclose conflicts of interest and legal matters

Global Recognition - Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders-often making the charter a prerequisite for employment. Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge - The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments,

economics, financial reporting standards, portfolio management, and wealth planning. The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. To learn more about the CFA charter, visit www.cfainstitute.org.

ITEM 3: DISCIPLINARY INFORMATION

Posto Asset Management (“PAM”) is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of each person providing investment advice to clients or who has discretionary authority over client assets. Mr. Victor has no applicable legal or disciplinary events required to be disclosed under this Item.

ITEM 4: OTHER BUSINESS ACTIVITIES

Mr. Victor is not actively engaged in any other investment-related business or occupation. Additionally, Mr. Victor does not receive any compensation, including bonuses and non-cash compensation, based on the sales of securities or other investments products. Mr. Victor publishes online content related to market news, economic developments, and financial literacy as his primary source of income.

ITEM 5: ADDITIONAL COMPENSATION

Mr. Victor does not provide advisory services to non-clients from which he derives an economic benefit.

ITEM 6: SUPERVISION

As the Chief Investment Officer, Mr. Victor is responsible for investment decisions and the monitoring of client investments on an ongoing basis. Mr. Victor can be reached at (305) 930-3890.