

STEERSON ADVISORS LLC

Form ADV Part 2

August 2023

This Brochure provides information about the qualifications and business practices of Steerson Advisors LLC (“Steerson”, “Steerson Advisors”, “us”, “we”, “our”). If you (“client”, “your”) have any questions about the contents of this brochure, please contact us at rcuchacovich@steerson.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

We are an investment adviser. Our registration as an investment adviser does not imply any level of skill or training. Additional information about Steerson Advisors LLC is also available on the SEC’s website at www.adviserinfo.sec.gov (click on the link, select “investment adviser firm” and type in our firm name). The results will provide you with both Parts 1 and 2 of our Form ADV.

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Advisory Business

Steerson Advisors LLC, is organized under the laws of the State of Florida since March 3, 2023. We are 100% owned by Rafael Cuchacovich. We filed our application to register as an investment adviser with the State of Florida, and other states as necessary, in order to provide the investment advisory services described within this document. As of July 31, 2023, we currently have three customer accounts with \$4,500,000 total assets under advisement.

This Disclosure Brochure provides you with information regarding our qualifications, business practices, and the nature of advisory services that should be considered before becoming our advisory client. Please contact Rafael Cuchacovich, Chief Compliance Officer, if you have any questions about this Brochure.

Qualified individuals associated with us will provide our investment advisory services. Such individuals are known as Investment Advisor Representatives (“IARs”). We require IARs engaged in determining or offering investment advice to our clients to be properly licensed and registered in all states in which they provide investment advisory services.

Below is a description of the investment advisory services we offer. For more detail on any product or service please reference your Client Investment Advisory Agreement (“IAA”) or contact your IAR. Your IAR may recommend various types of portfolio management services to help meet your investment goals, principle underlying this policy manual and represents the expected basis of all dealings with clients.

Advisory Services

We provide investment recommendations and advice regarding asset allocation, that is, an assignment of a percentage of the overall value of the account to one or more asset classes, and ongoing investment management services on a non-discretionary basis to high-net-worth individuals. Although IARs may oversee many investment accounts and some accounts may be managed with other accounts to a specific strategy, your account will be distinctly managed according to your personal needs, goals and investor profile.

During initial consultation(s), your IAR will have a comprehensive discussion about your financial condition, priorities and concerns. Based upon these conversations, we will then work to create either a formal investment policy statement or informal agreed upon investment objectives to serve as the primary point of reference and ensure that your objectives are clearly defined. We review your financial situation and needs with you on an ongoing basis, to accommodate changes to your long-term goals and objectives.

Our investment philosophy focuses on growing clients’ assets and preserving principal by investing primarily in equity and fixed income securities. Each portfolio is customized to suit individual investment needs and goals. You have the option of imposing reasonable investment restrictions on certain securities, industries, sectors or asset classes by providing us with written instructions when you decide to acquire our services, or at any time thereafter. Please note, such restrictions and personal investment preferences may affect the composition and performance of your portfolio. For these reasons, performance of the portfolio may not be identical with other clients.

Wrap Fee Programs

We do not intend to offer wrap fee service at this time.

Fees and Compensation

The payment and computation of compensation will be a percentage of realized capital gains and not a share of assets under management. Realized capital gains include capital appreciation, interest perceived and distributed dividends. This compensation scheme is for Qualified Clients only (as defined in Schedule I of the Investment Advisor Services Agreement). The compensation percentage over realized capital gains on variable income securities will amount to ten percent (10%) and for interest-bearing securities five percent (5%). The fee shall be calculated exclusively over positions and securities the Client has purchased and sold under the Adviser’s recommendation and scope of service. The fee will be earned on investments sold or interests earned and become payable within ten (10) calendar days. Recommended positions will be deemed sold and realized upon issuance of a sales recommendation by the adviser. The sales price will be determined by either the sales price at execution or the closing price at the day the sales recommendation was issued, provided that the Client elects to maintain the recommended position in the account. In the event that capital losses are realized, they shall be carried forward and deducted from

future realized capital gains in the computation of future compensation Fees until the full amount has been credited to the Client.

If the service is terminated, all unrealized positions in the client's account purchased under recommendation of the Adviser will be deemed realized. In the event that unrealized capital performance results in a net capital gain, the fee will be computed at the closing prices and become payable as of the effective date of termination.

Payment of Fees

We will bill clients directly for advisory services by sending an invoice directly to the client.

Other Fees

Our fees do not include brokerage commissions, transaction fees, and other brokerage related costs and expenses that are paid by you. You may pay additional fees imposed by custodians, brokers, and other third parties. The advisory fee does not cover charges imposed by third parties for investments held in the account, such as contingent deferred sales charges or 12b-1 trails on exchange-traded funds. In addition, each exchange-traded funds and exchange traded funds charge asset management fees, which are in addition to our advisory fees. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. The advisory fee described above does not cover debit balances or related margin interest or SEC fees or other fees or taxes required by law. The fees charged by such funds or managers are disclosed in each fund's prospectus. You should review the fund's prospectus for a complete description of all fees and expenses.

All of these other fees are exclusive of, and in addition to, our compensation. We do not offset our fees by these charges.

Termination of Contract

Client, upon written notice, shall have the right to terminate the IAA at any time. Charges in either case, if any, for services completed will be determined as set forth above. No other termination fee will be charged for termination of the IAA.

Detailed information on the termination terms and fees can be found in the applicable Investment Advisor Services Agreement.

Performance-Based Fees and Side-By-Side Management

Our fee structure is exclusively based upon performance-based fees as detailed in the Fees and Compensation item above, thus, our clients must meet at least one of the criteria defined in Schedule I of the Investment Advisor Services Agreement to be considered a Qualified Client and acquire our services.

Types of Clients

We only provide advisory services to Qualified Clients. We do not impose minimum account values beyond the ones encompassed under the definition of "Qualified Client".

Methods of Analysis, Investment Strategies and Risk of Loss

Termination of Contract

In determining the investment advice to give to you, we will employ fundamental, macroeconomic and cyclical methods of investment analysis. The main sources of information we use are financial research tools, publicly available data, media channels, research materials prepared by others, and company press

and financial information releases.

We will utilize a fundamental analysis in determining the investment advice to give to you in which we will analyze the financial statements and health of a business, its management and competitive advantages, and its competitors and markets, but usually focusing on value, growth or a combination of both to determine if such security meets the clients' needs and objectives. When making investment decisions, we will take into consideration the stages of the business during a given point in time. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the securities.

Cyclical analysis involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that we are recommending.

Investment Strategies (Ongoing Management)

Your investment portfolio will be tailored to help you accomplish your unique financial goals and objectives. In determining the recommendations to give to you, we will first gather and consider information regarding several factors, including your:

- current financial situation,
- investment goals and objectives,
- current and long-term needs,
- tolerance and appetite for risk, and
- level of investment knowledge.

After developing a thorough understanding of your risk tolerance, we may use one or more of the following investment strategies and work together to create a customized investment portfolio specifically designed for you:

- Near-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively short period of time, generally between 3 to 5 years.
- Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than 5 years.

You have the opportunity to place reasonable restrictions or constraints on the types of recommendations issued to your account. However, such restrictions may affect the composition and performance of your portfolio. For these reasons, performance of the recommended portfolio may not be identical to other clients of ours.

We will discuss and evaluate goals, risk tolerance, and time horizon. We will then determine the asset allocation and recommend specific strategies and securities. We will establish the appropriate accounts and recommend initial portfolio trades as soon as we have a good opportunity to offer that meets your requirements. Finally, we will evaluate performance, provide ongoing due diligence of investment positions, and adjust the portfolio accordingly if required.

We provide advice on a variety of securities, including but not limited to, equities, bonds, commercial paper, certificates of deposit (CDs), and exchange-traded funds (ETFs). The selection and use of these investment alternatives may depend on your financial situation. We will recommend adjustments to your portfolio as required to control risk, take profits or acquire new positions. We will suggest reductions or elimination of positions due to lack of performance, to replace them for better regarded alternatives, and to capture profits.

Risk of Loss, Disclosures and other important information

There are inherent risks involved for each investment strategy or method of analysis we use and the particular type of security we recommend. Investing in securities involves risk of loss which you should be prepared to bear. Depending on the types of securities we invest in, you may face the following investment risks:

Market Risk: The price of a security 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 events.

Business Risk: These risks are associated with a specific industry or a specific company within an industry. For example, early-stage 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.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

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.

Exchange-Traded Funds Risk: Exchange-traded funds are subject to ongoing and other expenses, which will be indirectly paid by clients. As a result, the cost of our investment strategies will be higher than the cost of investing directly in individual securities, as there are two levels of fees. Exchange-traded funds are subject to specific risks, depending on the nature of the fund.

Growth Style Risks: Due to their relatively high valuations, growth stocks are typically more volatile than value stocks. Further, growth stocks may not pay dividends or may pay lower dividends than value stocks. This means they depend more on price changes for returns and may be more adversely affected in a down market compared to value stocks that pay higher dividends.

Value Style Risks: Investments in value stocks are subject to the risk that their intrinsic values may never be realized by the market, that a stock judged to be undervalued may actually be appropriately priced, or that their prices may decline, even though in theory they are already undervalued. Value stocks can react differently to issuer, political, market and economic developments than the market as a whole and other types of stocks (e.g., growth stocks).

Company Size Risks: Generally, the smaller the market capitalization of a company, the fewer the number of shares traded daily, the less liquid its stock and the more volatile its price. Companies with smaller market capitalizations may also have unproven track records. These factors also increase risks and make these companies more likely to fail than companies with larger market capitalizations or asset base.

Foreign Investing Risks: Investments in foreign companies and markets carry a number of economic, financial and political considerations that are not associated with the U.S. markets and that could unfavorably affect account performance. Among those risks may be greater price volatility; weak supervision and regulation of securities exchanges, brokers and issuers; higher brokerage costs; fluctuations in foreign currency exchange rates and related conversion costs; adverse tax consequences; and settlement delays.

Fixed Income Securities: Client accounts with all or a portion of the underlying assets invested in fixed income securities and/or fixed-income based exchange-traded funds are subject to the following risks:

- **Interest Rate Risks:** Prices of fixed income securities rise and fall in response to changes in the interest rate paid by similar securities. Generally, when interest rates rise, prices of fixed income securities fall. Interest rate changes have a greater effect on the price of fixed income securities with longer maturities.
- **Credit Risks:** Credit risk is the possibility that an issuer or counterparty will default on a security or repurchase agreement by failing to pay interest or principal when due. If an issuer defaults the value of a fixed income security may decrease and a fund holding securities of that issuer may lose money. Lower credit ratings tend to correspond to higher credit risk. Bonds rated BBB or Baa may have speculative characteristics.
- **Call Risks:** If the fixed income securities in which a fund invests are redeemed by the issuer before maturity (or "called"), the fund may have to reinvest the proceeds in securities that pay a lower interest rate, which may decrease the portfolio's overall yield. This will most likely happen

when interest rates are declining.

- **Liquidity Risks:** Liquidity risk refers to the possibility that an investor may not be able to sell or buy a security or close out an investment contract at a favorable price or time. Consequently, an investor, including a fund invested in fixed income securities, may have to accept a lower price to sell a security, sell other securities to raise cash or give up an investment opportunity, any of which could have a negative effect on investment performance. Infrequent trading of securities also may lead to an increase in their price volatility.

Government Obligations Risks: No assurance can be given that the United States government will provide financial support to United States government-sponsored agencies or instrumentalities where it is not obligated to do so by law. As a result, there is risk that these entities will default on a financial obligation.

High-Yield Securities Risks: High-yield securities tend to be more sensitive to economic conditions than are higher-rated securities and generally involve more credit risk than securities in the higher-rated categories. The risk of loss due to default by an issuer of high-yield securities may be greater than issuers of higher-rated securities because such securities are generally unsecured and are often subordinated to other creditors. A fund may have difficulty disposing of certain high-yield securities because there may be a thin trading market for such securities.

The above list of risk factors does not purport to be a complete list or explanation of the risks involved in an investment strategy. There are many other circumstances not described here that could adversely affect your investment and prevent you from your investment objectives. The list represents the typical risks involved. The explanation of certain risks is not exhaustive, but rather highlights some of the more significant risks involved in our investment strategies. You are encouraged to consult your IAR and tax professional on an initial and continuous basis in connection with selecting and engaging in the services provided by us. In addition, due to the dynamic nature of investments and markets, strategies may be subject to additional and different risk factors not discussed above.

Disciplinary Information

We are required to disclose all material facts regarding any legal or disciplinary events. We do not have any events to report that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Other Financial Industry Activities and Affiliations

We are not, nor are any of our management persons (except as disclosed below), registered, nor do we have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor or as an associated person of the foregoing entities.

In addition, neither we nor any of our management persons have any arrangement that is material to our advisory business or to our clients that we or any of our management persons have with any related person that is under common control and ownership, i.e., a(n):

- Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund),
- Other investment adviser or financial planner,
- Futures commission merchant, or commodity pool operator or commodity trading advisor,
- Banking or thrift institution
- Accountant or accounting firm,
- Lawyer or law firm,
- Insurance company or agency,
- Pension consultant,

- Real estate broker or dealer, or
- Sponsor or syndicator of limited partnerships.

Third-Party Money Managers

We currently have no third-party money managers affiliated to our business or firm, however, we may recommend specific broker-dealers or third-party money managers based on the client's financial requirements and conditions. We have no fee-distribution agreement or receive any kind of direct compensation for such referrals.

Code of Ethics Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

We have adopted a written Code of Ethics in compliance with SEC Rule 204A-1 under the Investment Advisers Act of 1940 (as amended — the Advisers Act). All of our employees are deemed to be supervised persons subject to our Code of Ethics. In carrying on our daily affairs, all of our supervised persons shall act in a fair, lawful and ethical manner, in accordance with the rules and regulations imposed by our governing regulatory authority. The Code of Ethics sets forth standards of conduct and requires compliance with federal securities laws. Our Code of Ethics also addresses personal trading and requires our personnel to report their personal securities holdings and transactions to our Chief Compliance Officer.

We have created a Code of Ethics which establishes standards and procedures for the detection and prevention of certain conflicts of interest, including activities by which persons having knowledge of the investments and our investment intentions might take advantage of that knowledge for their own benefit. We have in place Ethics Rules (the "Rules"), which are comprised of the Code of Ethics and Insider Trading policies and procedures. The Rules are designed to ensure that our personnel (i) observe applicable legal (including applicable state and federal securities laws) and ethical standards in the performance of their duties; (ii) at all times place your interests first; (iii) disclose all actual or potential conflicts; (iv) adhere to the highest standards of loyalty, candor and care in all matters relating to our clients; (v) conduct all personal trading consistent with the Rules and in such a manner as to avoid any actual or potential conflict of interest or any abuse of their position of trust and responsibility; and (vi) not use any material non-public information in securities trading. The Rules also establish policies regarding other matters such as outside employment, the giving or receiving of gifts, and safeguarding portfolio holdings information.

Under the general prohibitions of the Rules, our personnel may not: 1) effect securities transactions while in the possession of material, non-public information; 2) disclose such information to others; 3) participate in fraudulent conduct involving securities held or to be acquired by any client; and 4) engage in frequent trading activities that create or may create a conflict of interest, limit their ability to perform their job duties, or violate any provision of the Rules.

In the event that you request a copy of our Code of Ethics, we will furnish to you a copy within a reasonable period of time at your current address of record. To request a copy, you can contact us at the address or telephone number on the cover page of this brochure, Attn: Chief Compliance Officer.

Personal Trading

Under the Code of Ethics, our personnel are required to conduct their personal investment activities in a manner that we believe is not detrimental to our advisory clients. Our personnel must conduct all personal trading in such a manner to avoid any actual or potential conflicts of interest or any abuse of their position of trust and responsibility. Our personnel are not permitted to engage in personal securities transactions except under circumstances specified in the Code of Ethics. The policy requires all supervised persons to report all personal transactions in securities not otherwise exempt under the policy. All reportable transactions are reviewed for compliance with the Code of Ethics. Reports of personal transactions in securities by our IARs are reviewed quarterly by our Chief Compliance Officer or his designee or more frequently if required.

We, or a related person, may buy, sell or hold securities we also recommend to clients, subject to the requirements of our internal policies and procedures. Our policies are based on the principle that we and our related person have a fiduciary duty to place the interests of clients ahead of their own interests. To the extent not prohibited by our policies, we and our related person may hold, acquire, increase, decrease or dispose of securities or other interests at or about the same time that we and our related person are purchasing or selling the same securities or interests for an advisory account.

We have created and implemented internal controls to monitor client account activity and proper allocation of investment opportunities, based on each client's stated investment objectives and risk tolerance, to address these conflicts.

Participation or Interest in Client Transactions

We may not effect transactions for clients under any circumstance.

Brokerage Practices

Broker-Dealer/Custodian Recommendations

In selecting or recommending a broker-dealer, we will consider the value of research and additional brokerage products and services a broker-dealer has provided or will provide to us and our clients. We may recommend that clients establish brokerage accounts with Morgan Stanley & Co LLC ("Morgan Stanley") or Interactive Brokers Group LLC, two FINRA-registered broker-dealers and members of SIPC, to maintain custody of clients' assets. We do not receive any direct benefits or soft-dollar compensation from such broker-dealers. We may also assist clients in selecting other broker-dealers they might have greater preference for. We do not charge any additional fees for such services.

Brokerage for Client Referrals

We do not consider, in selecting or recommending broker-dealers, whether we or a related person receives client referrals from the broker-dealer or third party.

Directed Brokerage

We do not have directed brokerage arrangements.

Trade Aggregation

We offer no trade aggregations. Each account is individually managed and as such each trade specifically executed.

Administrative Trade Errors

From time-to-time we may make an error in submitting an investment or trade recommendation. Trading errors may include a number of situations, such as:

- The wrong security is bought or sold by the client;
- A security is bought instead of sold;
- A transaction is executed for the wrong account,
- Security recommendations are issued to a client that had a restriction on such security; or
- Securities are recommended to the wrong accounts.

When this occurs, we may issue a correcting recommendation to the client. If an investment gain results from the corrective action, the gain will remain in your account and no fees will be charged on such gain. If a loss occurs due to our administrative trade recommendation error, we are responsible and will pay for the

loss to ensure that you are made whole.

Note: To furtherly avoid trade errors, it should be requested to the extent possible that custodians confirm the details of each order before submitting them to the market.

Review of Accounts

Reviews and Reviewers of the Accounts

Client holdings are monitored periodically. Reviews will be conducted at least quarterly by your selected IAR and involve an analysis of whether clients' accounts are in line with their investment objectives and are appropriately positioned, based on market conditions and investment policies, if applicable.

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, requests by the client, etc.

Nature and Frequency of Regular Reports Provided to Clients

You will receive monthly or, at least, quarterly statements for your account reflecting account values, positions, and activities from your account custodian.

Client Referrals and Other Compensation

Client Referrals

We currently have no client referral arrangements.

Other Compensation

We do not receive an economic benefit, including sales awards or other prizes from a non-client for providing investment advice or other advisory services to our clients.

Custody

We do not take physical possession of client funds or securities.

Investment Discretion

We do not accept discretionary authority to manage securities accounts on your behalf. Specifically, we do not have discretionary authority to determine which securities to buy or sell on your behalf, determine the amount of securities to be bought or sold on your behalf, the broker or dealer in which to execute such securities transactions, and determine what transaction fee rate shall be paid on your behalf.

In managing an investment portfolio, we act in a manner in keeping with what we understand and believe to be in your best interest. In making these buy and sell recommendations, we follow general guidelines established by you which may include instructions to have us refrain from purchasing certain securities. Any specific additional restrictions must be submitted to us in writing.

Voting Client Securities (i.e., Proxy Voting)

Proxy Voting

We do not accept or have the authority to vote proxies on your behalf. Our client advisory agreements, or other client documents, provide that our advisory clients expressly retain the authority and responsibility for voting proxies of portfolio securities. We may provide advisory clients with administrative assistance regarding proxy voting or issues; however, you have the responsibility to receive and vote any proxies.

Class Actions

From time-to-time securities held in your portfolio may be the subject of class action litigation. The decision regarding whether to file a proof of claim in a class action settlement is a question involving legal judgment. We do not instruct or give advice to you on whether or not to participate as a member of class action lawsuits and will not automatically file claims on your behalf. If you request additional assistance, we will provide any information pertaining to your securities that may be helpful and/or needed in order for you or your custodian to file a proof of claim in a class action.

Financial Information

We do not require or accept prepayments. We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to you. In addition, we are not currently, nor at any time in the past ten years been the subject of a bankruptcy petition.

Requirements for State-Registered Advisers

Each of our principal executive officers and management persons will provide their formal education and business background, including any business in which they are actively engaged (outside of giving investment advice) and the approximate amount of time spent on that business in a separate disclosure, the Form ADV Part 2B Supplement.

We do not, nor do any of our supervised persons receive asset-based fees compensation for advisory services.

We do not, nor any of our management persons, have material facts regarding any legal, financial or other “disciplinary” item to report.

We do not, or any of our management persons, have any relationship or arrangement with any issuer of securities that is not listed in Item 10 of this Brochure.

Brochure Supplement

This Brochure provides information about Rafael Cuchacovich that supplements the Steerson Advisors LLC (“Steerson Advisors”) Brochure (“Brochure”). You should have received a copy of that Brochure. Please contact Rafael Cuchacovich, Chief Compliance Officer at the telephone number listed above if you did not receive Steerson Advisor’s Brochure or if you have any questions about the content of this supplement.

Additional information about Rafael Cuchacovich is available on the SEC’s website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Rafael Cuchacovich

Year of Birth: 1993

Educational Background

Bachelors in Business Administration; Finance Specialization at Reichman University in Herzliya, Israel. Graduated with Honors (Magna Cum Laude).

Business Background (Previous Five Years)

DND Private Investments, Portfolio Manager, 11/2019-10/2020

Independent Financial Advisor 04/2017-08/2023

Steerson Advisors LLC 08/2023 to present

Professional Designations: None

Licenses: Rafael Cuchacovich currently holds the Series 65 (Uniform Investment Adviser Law Exam) license.

Disciplinary Information

Steerson Advisors LLC is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Rafael Cuchacovich. He does not have, nor has he ever had, any disciplinary disclosure.

Other Business Activities

Rafael Cuchacovich does not actively engage in any other investment-related business or occupation, nor does he have an application pending to register as a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or as an associated person of an FCM, CPO, or CTA.

Additional Compensation

Rafael Cuchacovich does not receive economic benefit, including sales awards, other prizes, and any

bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts, for providing advisory services.

Supervision

Steerson Advisors LLC has adopted, and updates as required, its compliance manual, which includes a formal code of ethics and insider trading policies and procedures, that outlines for each employee the rules and regulations to which they must adhere. Steerson Advisors has appointed a Chief Compliance Officer (“CCO”) who reviews and monitors employee activity with respect to these rules and regulations. In addition, Steerson Advisors has adopted a Code of Ethics that requires each employee to act in the best interest of clients at all times. Should you have questions related to these activities, please contact Rafael Cuchacovich, CCO at the telephone number shown on the cover page or via email at rcuchacovich@steerson.com.

Requirements for State-Registered Advisers

Rafael Cuchacovich has not been involved in any arbitration claims or any civil, self-regulatory organization or administrative proceeding involving investment advisory business or activities. In addition, Rafael Cuchacovich is not currently, nor has at any time been the subject of a bankruptcy petition.

Rev. 8/2023

FACTS	WHAT DOES STEERSON ADVISORS LLC DO WITH YOUR PERSONAL INFORMATION?
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Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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What?	<p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Tax Identification Number, Date of Birth, Telephone Number and Address • Annual Income, Tax Bracket, Account Balances and Transaction History • Net Worth, Assets and Employment History <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice</p>
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How?	<p>All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons companies can share their clients' personal information; the reasons Steerson Advisors LLC chooses to share; and whether you can limit this sharing.</p>
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Reasons we can share your personal information?	Does Steerson Advisors LLC Share?	Can you limit this sharing?
For our everyday business purposes - Such as to process your transactions, view your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes - To offer our services to you	Yes	No
For Joint Marketing with other financial companies	No	We don't share.
For our affiliates' everyday business purposes - Information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes - Information about your creditworthiness	No	We don't share.
For non-affiliates to market to you	No	We don't share

Who we are	
Who is providing this notice?	Steerson Advisors LLC

What we do	
How does Steerson Advisors LLC Protect my personal information	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Steerson Advisors LLC collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Provide your personal information • Seek Investment Advice • Complete an application <p>We also collect your personal information from other, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes-information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Steerson Advisors LLC does not share with affiliates so they can market to you.</i>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Steerson Advisors LLC does not share with non-affiliates so they can market to you.</i>
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>Steerson Advisors LLC does not jointly market.</i>

Other important information	

Questions?	Email: rcuchacovich@steerson.com
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