

**FORM ADV PART 2A
DISCLOSURE BROCHURE**

**Virtuoso Asset
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This brochure provides information about the qualifications and business practices of Virtuoso Asset Management LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at (646) 784-5598. 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.

Additional information about Virtuoso Asset Management LLC (CRD #313782) is available on the SEC's website at www.adviserinfo.sec.gov

JULY 16, 2021

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Initial Filing.

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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Item 4: Advisory Business

Firm Description

Virtuoso Asset Management LLC (“VAM”) was founded in 2021. Tiffany Soricelli is 100% owner. As detailed below, VAM primarily offers investment management, investment advisory services, and financial planning services to individuals, trusts, estates, non-profit organizations, sole proprietorships, LLCs, corporations and other business entities.

VAM always serves clients in a fiduciary capacity and helps them develop an investment strategy that’s customized to their individual goals and objectives.

Types of Advisory Services

ASSET MANAGEMENT

As a fee-only fiduciary, VAM offers discretionary asset management services to advisory clients. VAM consults with the clients initially and on an ongoing basis to determine individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize VAM discretionary authority to execute the agreed upon investment program and transactions as stated within the Investment Advisory Agreement.

Clients are advised to promptly notify VAM if there are changes to their financial situation or investment objectives or if they wish to impose any reasonable restrictions on VAM’s management services. Clients may impose reasonable restrictions on the management of their account (e.g. retain long-held legacy positions, or invest a portion in ESG funds) if, in VAM’s sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

FINANCIAL PLANNING AND CONSULTING

VAM provides financial planning and consulting services to help clients alleviate their fear, stress, and anxiety around their finances and align their daily, weekly, and monthly financial behaviors with their long-term financial goals.

Financial planning services include a comprehensive evaluation of an individual’s current financial situation and in-depth conversations around the client’s goals and desired future financial state. Through the review and analysis of currently known variables, VAM will work with the client to predict future cash flows, asset values, withdrawal strategies, and probability of achieving their goals.

Topics reviewed in a financial plan may include but are not limited to:

- **Financial goals:** Clearly defined financial goals serve as the guideposts for all financial planning and investment strategies. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending analysis helps determine how much can be set aside for a client’s financial goals which may include debt repayment, savings, and investing on a monthly or annual basis.

- **Retirement strategy:** Aligning one's retirement income and lifestyle goals with current financial behaviors including savings rate and investment activities. Strategy typically includes a plan for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** A risk management analysis identifies all risk exposures and provide the recommended coverages to protect the client and their assets against financial loss. The risk management plan may include a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverages.
- **Long-term investment plan:** Includes a review of the clients overall financial position and develops a customized asset allocation strategy based on individual investment objectives, time horizon, and risk profile. An investment plan sets guidelines for selecting, buying, and selling investments while also establishing benchmarks for performance review.
- **Efficient tax strategy:** Identify ways to plan for and potentially minimize taxes on business and personal income to the extent permissible by the tax code. The strategy may include recommended business practices for organizing and tracking expenses along with the identification of tax-favored savings and investment vehicles that can reduce clients Adjusted Gross Income (AGI) and thus, taxes owed.
- **Estate planning:** A review provides a second look at the client's estate planning documents to ensure all beneficiaries for retirement accounts and life insurance policies are accurate and up-to-date. VAM may prompt the client to update documents when the legal environment changes or around the occurrence of a major life events such as a birth, marriage, or death in the family.

In performing its financial planning services, VAM, assumes that the information provided by the client is accurate and true. VAM is not required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information as presented. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

As a fee-only fiduciary, VAM is required to disclose any and all conflict of interests to the client. If a conflict of interest exists between the interests of VAM and the interests of the Client, the Client is under no obligation to act upon VAM's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through VAM.

SUBSCRIPTION/NEWSLETTERS

VAM offers a membership service model to individuals seeking ongoing financial education, coaching, access to online tools, and online course access. Services include but are not limited to:

- A monthly subscription-based newsletter
- Online account aggregation through VAM's planning software
- Access to a secure online vault for important document storage

- Online “member only” course access

VAM’s consulting services, and financial planning are offered for an additional discounted fee to members.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

VAM does not sponsor any wrap fee programs.

Client Assets under Management

As this is the initial filing of this brochure, VAM has no Client assets under management.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

VAM provides financial planning and investment advisory services for flat fees. We have no hidden charges and sell no commission-based products due to the inherent conflict of interest they present. Specific fees are listed below.

ASSET MANAGEMENT

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

Assets Under Management	Max Annual Fee	Max Quarterly Fee
\$500,000 +	1.00%	.2500%
\$250,000 - \$499,999	1.15%	.2875%
\$100,000 - \$249,999	1.20%	.3000%
\$1,000 - \$99,999	1.25%	.3125%

This is a tiered or breakpoint fee schedule, the entire portfolio is charged the same asset management fee. The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by VAM with thirty (30) days written notice to Client and by the Client at any time with written notice to VAM. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to VAM. Client shall be

given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

FINANCIAL PLANNING AND CONSULTING

VAM charges either an hourly fee for investment advice or fixed fee for financial planning services. Prior to the planning process the Client will be provided a planning proposal detailing the estimated plan fee. Services are completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing the Planning Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to VAM. Fees for financial plans are billed 50% in advance with the balance due upon plan delivery or upon commencement of the Planning Agreement.

HOURLY FEES

Financial Planning Services are offered based on an hourly fee of \$250 per hour.

FIXED FEES

Financial Planning Services are offered based on a flat fee between \$50 and \$1,500 (based on service type and plan complexity).

SUBSCRIPTION/NEWSLETTER

VAM offers a monthly membership option for new investors and non-clients. Membership includes a monthly newsletter, access to online planning tools, secure vault for document storage, and discounts on planning services. For these services, VAM charges a fee of \$5 paid monthly via an online portal/directly to VAM via a Client invoice. These fees are in addition to any other advisory fee(s) the Client pays to VAM. At its discretion, VAM may waive the subscription fee for Advisory Clients. The Client may cancel within five (5) business days of signing the agreement with no obligation and without penalty. If not cancelled within five (5) business days, the subscription will be set to automatically renew month over month unless terminated by VAM with thirty (30) days written notice or by the Client at any time with written notice to VAM.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing or they may pay VAM directly. The Client must consent in advance to direct debiting of their investment account.

Fees for financial planning services will be billed to the Client and paid directly to VAM.

Additional Client Fees Charged

The compensation and fees charged by VAM and outlined above represent the total compensation and fees received by VAM.

Custodians may charge transaction fees or other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. These fees are in addition to the advisory fee you pay to VAM. VAM will, to the extent feasible, fully explain and estimate the total amount of client fees and expenses. VAM does not receive any compensation from these fees and works to

build investment recommendations taking all costs into consideration. For more details on the custodian practices, see Item 12 of this brochure.

Prepayment of Client Fees

VAM does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for financial plans may be billed 50% in advance with the balance due upon plan delivery. The Client may choose to pay the full amount due at the commencement of the contract if they wish.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to VAM.

External Compensation for the Sale of Securities to Clients

VAM does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of VAM.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

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

VAM does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for VAM to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

VAM generally provides investment advice to individuals, trusts, estates, non-profit organizations, sole proprietorships, LLCs, corporations and other business entities. Client relationships vary in scope and length of service.

Account Minimums

VAM recommends a minimum of \$1,000 to open an account.

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

Methods of Analysis

VAM will analyze a Client's total financial condition, financial needs, goals, tolerance and capacity for bearing risk, and recommend an appropriate asset allocation.

Security analysis methods may include fundamental analysis, technical analysis, and Monte Carlo simulations. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in

stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

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

Monte Carlo planning technique is used to calculate the percentage probability of specific scenarios that are based upon a set group of assumptions and standard deviations. This method of calculation has often been used in investment and retirement planning to project the likelihood of achieving one's financial or retirement goals and whether or not a retiree will have enough income to live on for life, given a wide range of possible outcomes in the markets. While there are no absolute parameters for this type of projection, the underlying assumptions for these calculations typically include such factors as interest rates, the client's age and projected time to retirement, the amount of the investment portfolio that is spent or withdrawn each year and the portfolio allocation.

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

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

Investment Strategy

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

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with VAM:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in

stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

Item 9: Disciplinary Information

Criminal or Civil Actions

VAM and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

VAM and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

VAM and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of VAM or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

VAM is not registered as a broker-dealer and no affiliated representatives of VAM are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither VAM nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Tiffany Soricelli is the owner of Virtuoso Advising for Artists, a career coaching service tailored to artists and creative professionals. She may offer Clients services and may receive separate yet typical compensation from these activities.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the compensation received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these services through another person or agency of their choosing.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

VAM does not select or recommend other investment advisors.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of VAM have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of VAM affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of VAM. The Code reflects VAM and its supervised persons’ responsibility to act in the best interest of their Client.

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

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

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

The Code applies to “access” persons. “Access” persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

VAM will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

VAM and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

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

VAM and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide VAM with copies of their brokerage statements.

The Chief Compliance Officer of VAM is Tiffany Soricelli. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

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

VAM does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

The Chief Compliance Officer of VAM is Tiffany Soricelli. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices**Factors Used to Select Broker-Dealers for Client Transactions**

VAM currently uses the Schwab Advisor Services division of Charles Schwab & Co., Inc.¹ ("Schwab"), a FINRA² registered broker-dealer and SIPC³ member, to maintain custody of Clients' assets and to effect trades for their accounts. VAM is independently owned and operated and not affiliated with Schwab. VAM has evaluated Schwab and believes that it will provide our Clients with the professional execution services, commission costs, user-friendly technology, administrative resources and responsiveness that will assist our firm in meeting our fiduciary obligations to Clients. Clients should be aware that not all firms require the use of a particular brokerage firm.

Schwab provides VAM with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them. These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our Client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Charles Schwab & Co. also makes available to VAM other products and services that benefit VAM but may not directly benefit our Clients' accounts. Many of these products and

¹ For information regarding Schwab, please refer to their website: <https://www.schwab.com/>.

² FINRA is the largest independent regulator for all securities firms doing business in the United States. For more information, please refer to FINRA's website: <http://www.finra.org/>.

³ For information regarding SIPC, please refer to their website: <http://www.sipc.org/>.

services may be used to service all or some substantial number of our Client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist VAM in managing and administering our Clients' accounts include software and other technology that:

- provide access to Client account data (such as trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple Client accounts;
- provide research, pricing and other market data;
- facilitate payment of our fees from Clients' accounts; and
- assist with back-office functions, recordkeeping and Client reporting.

Charles Schwab & Co. also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- compliance, legal and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to VAM. Charles Schwab & Co. may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Charles Schwab & Co. may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that Clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

- *Directed Brokerage*
VAM does not allow directed brokerage accounts.
- *Brokerage for Client Referrals*
VAM does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.
- *Best Execution*
Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. VAM does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by VAM from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, VAM receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of VAM. These benefits include both proprietary research from the broker and other research written by third parties.

VAM does not participate in any soft dollar arrangements.

Aggregating Securities Transactions for Client Accounts

VAM is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of VAM. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of VAM. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

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

Review of Client Accounts on Non-Periodic Basis

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

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by VAM's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

As disclosed under Item 12 above, VAM receives an economic benefit from Schwab in the form of the support products and services it makes available to VAM and other independent investment advisors that have their Clients maintain accounts at Schwab. These products and services, how they benefit VAM, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to VAM of Schwab’s products and services is not based on VAM giving particular investment advice, such as buying particular securities for our Clients.

Products & Services Available to Us from Schwab

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab’s business serving independent investment advisory firms like ours. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis and at no charge.

Services that Benefit Client

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit clients or their account(s).

Services that May Not Directly Benefit Clients

Schwab also makes available to us other products and services that benefit us but may not directly benefit the client or their account(s). These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or some substantial number of our clients’ accounts, including accounts not maintained at Schwab.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party’s fees.

Advisory Firm Payments for Client Referrals

VAM does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at a qualified custodian, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged

to compare the account statements received directly from their custodians to any documentation or reports prepared by VAM.

VAM is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of VAM.

Item 16: Investment Discretion

Discretionary Authority for Trading

VAM requires discretionary authority to manage securities accounts on behalf of Clients. VAM has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

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

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

Item 17: Voting Client Securities

Proxy Votes

VAM does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, VAM will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided to Clients because VAM does not serve as a custodian for Client funds or securities and VAM does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

VAM has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

VAM has not had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Neither VAM nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither VAM nor its management have been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 1. An investment or an investment-related business or activity;
 2. Fraud, false statement(s) or omissions;
 3. Theft, embezzlement or other wrongful taking of property;
 4. Bribery, forgery, counterfeiting, or extortion;
 5. Dishonest, unfair or unethical practices.
 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 1. An investment or an investment-related business or activity;
 2. Fraud, false statement(s) or omissions;
 3. Theft, embezzlement or other wrongful taking of property;
 4. Bribery, forgery, counterfeiting, or extortion;
 5. Dishonest, unfair or unethical practices.
-

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Item 1 Cover Page

SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Tiffany Soricelli

**Virtuoso Asset
Management LLC**

Office Address:
40 Witbeck Drive
Glenville, NY 12302

Mailing Address:
PO Box 2514
Glenville, NY 12325

Tel: 518-707-0600

Tiffany@VirtuosoAssetManagement.com

Website:
www.VirtuosoAssetManagement.com

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

Additional information about Tiffany Soricelli (CRD #6473884) is available on the SEC's website at www.adviserinfo.sec.gov.

JULY 16, 2021

Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure

Principal Executive Officer – Tiffany Soricelli

- Year of birth: 1983
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Item 2 - Educational Background and Business Experience

Educational Background:

- SUNY Potsdam; Bachelor of Music, 2006
- SUNY Potsdam, Master of Music, 2010

Business Experience:

- Virtuoso Asset Management LLC; Managing Member/Investment Advisor Representative; 04/2021 – Present
 - Virtuoso Advising for Artists; Owner; 06/2018 - Present
 - Marshall and Sterling Wealth Advisors, Inc.; Investment Advisor Representative; 09/2018 – 04/2021
 - LPL Financial LLC; Registered Representative; 09/2018 – 04/2021
 - Northwestern Mutual Investment Services, LLC; Registered Representative; 08/2015 – 09/2018
 - Parks and Trails New York; Director of Development; 05/2013 – 07/2015
 - The Sage Colleges; Assistant Director of Annual Giving; 08/2011 – 05/2013
 - The Orchestra of Northern New York; Business Manager; 10/2008 – 08/2011
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Item 3 - Disciplinary Information

- A. Tiffany Soricelli has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which she:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Tiffany Soricelli never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which she:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Tiffany Soricelli has never been the subject of a self-regulatory organization (SRO) proceeding in which she:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Tiffany Soricelli has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Tiffany Soricelli is also the owner of Virtuoso Advising for Artists, a career coaching service tailored to artists and creative professionals. She may offer Clients services and may receive separate yet typical compensation from these activities.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the compensation received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these services through another person or agency of their choosing.

Item 5 - Additional Compensation

Tiffany Soricelli does not receive any additional compensation or performance-based fees.

Item 6 - Supervision

Since Tiffany Soricelli is the sole owner and investment adviser representative of VAM she is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. She will adhere to the policies and procedures as described in the firm's Compliance Manual. She can be reached at Tiffany@VirtuosoAssetManagement.com or (646) 784-5598.

Item 7 - Requirements for State-Registered Advisors

- A. Tiffany Soricelli has not been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
- B. Tiffany Soricelli has never been the subject of a bankruptcy petition.