



## **Firm Brochure**

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Sachetta, LLC. If you have any questions about the contents of this brochure, please contact us at: 781-233-4138, or by email at: [info@sachetta.com](mailto:info@sachetta.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.

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

June 2, 2025

## **Material Changes**

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### **Annual Update**

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

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### **Material Changes since the Last Update**

Since the last annual filing of our Form ADV Part 2A, we have the following material changes to report:

- Our firm has entered into a promotional relationship with an unaffiliated third party. Please see Item 14 of our Form ADV Part 2A for additional information and important conflict of interest disclosures.

Our current Form ADV, Part 2A is available to our existing and prospective clients 24 hours a day through the Investment Adviser Public Disclosure website. Additionally, we will annually and within 120 days of the end of our fiscal year, provide you either: (i) a copy of our Form ADV, Part 2 that includes or is accompanied by a summary of material changes; or (ii) a summary of material changes that includes an offer to provide a copy of the current Form ADV, Part 2A. We urge you to carefully review all subsequent summaries of material changes, as they will contain important information about any significant changes to our firm, including but not limited to advisory services, fee structure, business practices, conflicts of interest, and disciplinary history.

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### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 781-233-4138 or by email at: [info@sachetta.com](mailto:info@sachetta.com)

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## **Advisory Business**

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### **Firm Description**

Sachetta & Callahan, LLC, was founded in 1984 as Sachetta & Company, LLC. In 2013, Infinite Wealth Management, Inc. and Sachetta & Company, LLC merged to form the single firm of Sachetta & Callahan, LLC. The owners of Sachetta & Callahan, LLC have remained the same as they were as Infinite Wealth Management, Inc.

On August 5, 2013, Sachetta & Callahan, LLC acquired Financial Planning Horizons, Inc. of Portsmouth, NH.

On August 3, 2015, Sachetta & Callahan, LLC acquired Quest Financial Services, Inc. of Lynnfield, MA.

In December of 2021, Sachetta & Callahan, LLC was renamed to Sachetta, LLC as it merged with Wealth Management Advisors, LLC and all clients, not already with Sachetta & Callahan, LLC were assigned to Sachetta, LLC

Sachetta, LLC provides personalized confidential tax preparation, financial planning and investment management to individuals, profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, tax preparation, insurance review, investment management, education funding, retirement planning, and estate planning.

Sachetta, LLC is a fee-only tax, financial planning and investment management firm. The firm does not receive commissions for purchasing or stocks, bonds, mutual funds, limited partnerships, or other commissioned products.

Sachetta, LLC does not act as a custodian of client assets. The client always maintains asset control. Sachetta, LLC places trades for clients under a limited power of attorney.

Other professionals (e.g., lawyers, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, televideo, or in person, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

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### **Principal Owners**

No person at Sachetta, LLC has 25% or more ownership of the firm. Major owners are as follow:

Stephen Ahern – 23%

Michael Callahan – 20%  
Stephen Sachetta – 20%  
Georgios Liakakis – 12%  
Eric Sachetta– 12%  
Matthew Stead – 12%

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## **Types of Advisory Services**

Sachetta, LLC provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services and furnishes investment advice through consultations.

Sachetta, LLC also furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and other services that often include estate planning.

**As of December 31, 2024, Sachetta, LLC managed approximately \$884 million in total assets, of which approximately \$877 million are managed on a discretionary basis and approximately \$7 million are managed on a non-discretionary basis.**

## **Types of Agreements**

The following agreements define the typical client relationships.

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### **Financial Planning Agreement**

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

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### **Wealth Management Advisory Agreement**

Most clients choose to have Sachetta, LLC manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis. Sachetta, LLC offers these clients our investment management services,

financial planning services, unlimited consultations, and the annual preparation of their personal income tax returns.

The annual Wealth Management Advisory Agreement fee is equal to 0.33% per year on all assets managed plus a flat fee portion which is based on the complexity of each client's situation and is quoted specifically to each client.

The minimum annual fee is \$10,000 and is negotiable based upon certain criteria (i.e. level of service required, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition and complexity, negotiations with client, etc.).

Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Wealth Management Advisory Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The average portfolio value for the month prior to termination is used as the basis for the final fee computation, adjusted for the number of days during the billing month prior to termination.

Tax preparation work is performed as an integral part of the Wealth Management Advisory Agreement. Eligible federal and applicable state returns are filed electronically without an additional fee.

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### **Launch Investment Program**

Our firm also offers portfolio management services through Launch,

Launch may be appropriate for younger clients with lower asset portfolios and less complicated financial situations.

Launch clients are charged a fixed \$100 monthly fee and an additional fee equal to 0.33% per year on all assets managed.

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### **Asset Management**

Assets are invested primarily in no-load mutual funds and exchange-traded funds through our account custodians. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. There may be a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Sachetta, LLC does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and



mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through Sachetta, LLC.

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### **Income Tax Preparation**

Sachetta, LLC provides tax preparation services to individuals and small businesses. Individual clients who meet our minimum fee of \$10,000 per year receive their income tax preparation at no additional cost. Individuals and small businesses who engage us for these services outside of a Wealth Management Advisory Agreement do so at a separately negotiated fee.

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### **Termination of Agreement**

A Client may terminate any of the aforementioned agreements at any time by notifying Sachetta, LLC in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Sachetta, LLC will refund any unearned portion of the advance payment.

Sachetta, LLC may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Sachetta, LLC will refund any unearned portion of the advance payment.

## **Fees and Compensation**

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### **Description**

Sachetta, LLC bases its fees on a percentage of assets under management, hourly charges, and fixed fees. The minimum annual fee for Wealth Management services is \$10,000.

Existing Wealth Management services clients are not charged separately for financial planning services.

Launch program requires a minimum monthly payment of \$100.

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### **Fee Billing**

Investment management fees are billed as specified in each client's investment advisory agreement, either monthly or quarterly, in arrears or in advance. Fees are based on the *average* account balance during the preceding billing cycle or on the account balance at the end of the previous billing cycle. Fees are deducted from a designated client account to facilitate billing.

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### **Other Fees**

Custodians and/or brokers may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The

selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Sachetta, LLC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee 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.).

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## **Cash Holdings**

Unless agreed otherwise, any and all account asset classes, including cash positions, are included in the firm's advisory fee calculation. At certain times our advisory fee may exceed the money market yield for cash assets.

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## **Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Sachetta, LLC, but Sachetta, LLC receives no portion of the mutual fund expense ratio.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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## **Performance-Based Fees**

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### **Sharing of Capital Gains**

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

Sachetta, LLC does not 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 a higher degree of risk to the client.

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## **Types of Clients**

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### **Description**

Sachetta, LLC generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

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## **Account Minimums**

While we do not have a minimum account size, our minimum annual fee is \$10,000.

Depending upon circumstances, Sachetta, LLC may sign an *Hourly Agreement* with the client if assets have diminished significantly.

Sachetta, LLC has the discretion to waive the account minimum. Exceptions may apply to employees of Sachetta, LLC and their relatives, or relatives of existing clients.

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

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### **Methods of Analysis**

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

**Fundamental Analysis:** Fundamental analysis of a business involves analyzing its income statement, financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis school of thought maintains that markets may mis-price a security in the short run but that the "correct" price will eventually be reached. Profits can be made by trading the mis-priced security and then waiting for the market to recognize its "mistake" and re-price the security.

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock. Therefore, unforeseen market conditions and/or company developments may result in significant price fluctuations that can lead to investor losses.

**Technical Analysis:** Technical analysis seeks to identify price patterns and trends in financial markets and attempt to exploit those patterns. We follow and examine such indicators as price, volume, moving averages of the price and market sentiment. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Sachetta, LLC may use include Morningstar Office mutual fund information, Morningstar Office stock information, Fidelity Investments research information, and the World Wide Web.

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## **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation. This means that we use mutual funds and exchange traded funds to develop a well-diversified portfolio. Portfolios are globally diversified to control the risk associated with traditional markets. Diversification may be adjusted periodically depending on the investment markets, or the client's financial situation and risk tolerance.

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.

Asset Allocation: Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance. A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual fund and/or ETF analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable of the client's portfolio.

Long-term purchases: We purchase securities with the idea of holding them in the clients account for a year or longer. We may do this because we believe the securities to be currently undervalued. We may do this because we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that, by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases: We purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A risk in a short-term purchase strategy is that, should the anticipated price swing not materialize, we are left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss. In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

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## **Risk of Loss**

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:

- **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.
- **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 events.
- **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.
- **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 are not.

- 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.

## **Disciplinary Information**

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### **Legal and Disciplinary**

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

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

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### **Activities**

Sachetta, LLC also provides income tax preparation services to individuals and small businesses. Clients who elect to engage us for those services outside of a Wealth Management relationship pay a separate fee solely for those services.

Since we endeavor at all times to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser and take the following steps to address these conflicts:

- We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and its employees to earn compensation from advisory clients in addition to our advisory fees;
- We disclose to clients that they are not obligated to purchase any additional services from our firm or its employees;
- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- Our management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm;
- We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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## **Affiliations**

Sachetta, LLC has arrangements that are material to its advisory business.

Joseph Sachetta is on the Board of Directors at the Everett Co-Operative Bank.

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

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### **Code of Ethics**

The employees of Sachetta, LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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### **Participation or Interest in Client Transactions**

Sachetta, LLC 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. Employees comply with the provisions of the Sachetta, LLC *Compliance Manual*.

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### **Personal Trading**

The Chief Compliance Officer of Sachetta, LLC is Matthew J. Stead. He/she reviews all employee trades each quarter. His/her trades are reviewed by Michael J. Callahan. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

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## **ERISA Disclosures**

Consistent with this fiduciary duty, Sachetta, LLC is required to disclose applicable conflicts of interest associated with its rollover recommendations. Sachetta, LLC's rollover recommendations creates a conflict of interest if the firm will earn a new (or increase its current) advisory fee on the rolled over assets. Please see Item 5 of Form ADV Part 2A for further information regarding Sachetta LLC's services, fees, and other conflicts of interest.

Clients and prospective clients considering a rollover from a qualified employer sponsored workplace retirement plan ("Employer Retirement Plan") to an Individual Retirement Account ("IRA"), or from an IRA to another IRA, are encouraged to consider and to investigate the advantages and disadvantages of an IRA rollover from their existing plan or IRA, including, but not limited to, factors such as management expenses, transaction expenses, custodial expenses and available investment options.

Potential alternatives to a rollover may include:

- Leaving the money in your former Employer Retirement Plan, if permitted;
- Rolling over the assets to your employer's plan, if one is available and if rollovers are permitted;
- Rolling over Employer Retirement Plan assets into an IRA; or
- Cashing out (or distribute) the Employer Retirement Plan assets and paying the taxes due.

## **Brokerage Practices**

### **Selecting Brokerage Firms**

We do not request or accept the discretionary authority to determine the broker dealer to be used for client accounts. This means that we will not survey or shop the brokerage market place for best execution on a transaction-by-transaction basis. As such, clients must direct us as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that we will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to the client and those charged to other clients. *Not all advisers require their clients to direct brokerage.*

For clients in need of brokerage or custodial services, and depending on client circumstances and needs, we will recommend the use of Fidelity Brokerage Services LLC ("Fidelity"), or Charles Schwab & Co., Inc. ("Schwab"), both members NYSE/SIPC, provided that such recommendation is consistent with our fiduciary duty to the client. Our clients must evaluate Fidelity or Schwab before opening an account. The factors considered by our firm when making this recommendation are the broker's ability to provide professional services, our experience with the broker, the broker's reputation, and the broker's quality of execution services and costs of such services, and the custodial platform provided to clients, among other factors.

*Clients are not under any obligation to effect trades through any recommended broker.*

If a client, when undertaking an advisory relationship with our firm, already has a pre-established relationship with a broker and instructs us to execute all transactions through that broker, it should be understood that under those circumstances, we will not have the authority to negotiate commissions, obtain volume discounts and best execution may not be achieved. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to other clients since our firm may not be able to aggregate orders to reduce transaction costs or the client may receive less favorable prices.



We reserve the right to decline acceptance of any client account for which the client directs the use of a broker if we believe that this choice would hinder its fiduciary duty to the client and/or its ability to service the account.

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### **Soft Dollar Practices**

We have not entered into any formal soft-dollar arrangements.

Fidelity and/or Schwab may provide research information in expectation of future business. Custodians may provide discounted software or discounted subscriptions with the expectation of future business.

Fidelity and/or Schwab may send compliance newsletters and other publications that are very helpful in maintaining an up-to-date compliance program. The Company does not pay for these publications.

Fidelity and Schwab provide web-based software to access client accounts and to upload advisory fee invoices for direct debit. The Company does not pay for this capability.

Fidelity and/or Schwab hold periodic conferences offering education on current topics relevant in the investment and financial planning world. The Company may attend these conferences from time to time at no cost.

Exhibitors at conferences pay a significant amount of money to exhibit. Exhibitor fees reduce the attendee fees that the Company advisers have to pay to attend the conferences. As a means of thanking exhibitors for their support, the Company advisers visit the exhibitors' booths.

Consequently, participation in the Fidelity Institutional Wealth Services Program and Schwab Advisor Services Program may result in a potential conflict of interest for our firm, as the receipt of the above benefits creates an incentive for us to use Fidelity and Schwab for the execution of client trades.

Nonetheless, we have reviewed the services of Fidelity and Schwab (and their affiliates) and recommend the services based on a number of factors. These factors include the professional services offered, commission rates, and the custodial platform provided to clients. We may periodically attempt to negotiate lower commission rates for our clients with Fidelity and Schwab.

Should we decide to use another broker dealer to execute a client trade due to better availability, liquidity, or pricing, Fidelity and Schwab may charge an additional trade-away fee for each such trade. Therefore, we will only use this trade-away ability in situations with compelling financial reasons.

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### **Client Referrals**

Sachetta, LLC does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate anyone for client referrals.

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## **Order Aggregation**

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

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## **Review of Accounts**

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### **Periodic Reviews**

Account reviews are performed periodically, typically quarterly, by our Investment Committee. Account reviews are performed more frequently when market conditions dictate.

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### **Review Triggers**

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

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### **Regular Reports**

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic investment performance communications on at least a quarterly basis.

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## **Client Referrals and Other Compensation**

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### **Incoming Referrals**

Sachetta, LLC has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. Unless otherwise disclosure, the firm does not compensate referring parties for these referrals.

Additionally, has entered and may enter in the future into solicitation or promotional agreements with third parties. In accordance with such arrangements, if a client is introduced to us by such a solicitor or a promoter, we may pay that solicitor or promoter an ongoing referral fee for the duration of the advisory relationship.

All such referral fees or other compensation for promotional activities are paid in accordance with the requirements of Rule 206(4)-1 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements:

- Any such referral fee or other compensation will be paid solely from our investment management fee, and will not result in any additional charge to the client;

- Any solicitor or promoter, at the time of the solicitation or other promotional activity, will disclose the nature of his/her/its solicitor or promoter relationship and provide each prospective client with a written or oral disclosure statement from the solicitor or promoter to the client disclosing the terms of the solicitation or promotional arrangement between our firm and the solicitor or promoter, including the compensation to be received by the solicitor or promoter from us; and
- All referred clients will be carefully screened to ensure that our fees, services, and investment strategies are suitable to their investment needs and objectives.

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### **Referrals Out**

Sachetta, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

### **Custody**

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#### **Account Statements**

Custody is defined as any legal or actual ability by our firm to access client funds or securities. Since all client funds and securities are maintained with a qualified custodian, we don't take physical possession of client assets. However, under the current SEC rules, our firm is deemed to have constructive custody of certain client assets. Therefore, we urge all of our management clients to carefully review and compare their quarterly reviews of account holdings and/or performance results received from us to those they receive from their custodian. Should you notice any discrepancies, please notify us and/or your custodian as soon as possible.

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#### **Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Sachetta, LLC.

### **Investment Discretion**

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#### **Discretionary Authority for Trading**

Sachetta, LLC accepts discretionary authority to manage securities accounts on behalf of clients. Sachetta, LLC 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.

The client approves the custodian to be used. Sachetta, LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment strategy that we have discussed with you.

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### **Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

### **Voting Client Securities**

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#### **Proxy Votes**

Sachetta, LLC does not vote proxies on securities. Clients are expected to vote their own proxies.

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

### **Financial Information**

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#### **Financial Condition**

Sachetta, LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Sachetta, LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

## **Brochure Supplements**

(Part 2B of Form ADV)

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### **Education and Business Standards**

Sachetta, LLC requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, CLU, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

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### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

**Certified Financial Planner (CFP):** Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

**Certified Public Accountant (CPA):** CPA is the statutory title of qualified accountants in the United States who have passed the Uniform Certified Public Accountant Examination and have met additional state education and experience requirements for certification as a CPA.

**Personal Financial Specialist (PFS):** The PFS credential was established for CPAs in the United States who specialize in personal financial planning. The credential is awarded exclusively to members of the American Institute of Certified Public Accountants (AICPA) who have demonstrated considerable experience and expertise in that area. As of today, the AICPA has granted approximately 3,300 CPA/PFS credentials. The FPS designation is available to CPAs, and is based on a points system, where a minimum of 100 points must be accrued.

**Chartered Financial Consultant (ChFC):** ChFC is a financial planning designation for the insurance industry awarded by the American College of Bryn Mawr. ChFCs must meet experience requirements and pass exams covering finance and investing. They must have at least three years of experience in the financial industry, and have studied and passed an examination on the fundamentals of financial planning, including income tax, insurance, investment and estate planning.

Joseph Sachetta, CFP®, CPA/PFS, MBA, MST

**Educational Background:**

- Bentley College, Bachelor's Degree in Accountancy, 1980
- Bentley College, MBA, 1983
- Bentley College, Master's Degree in Taxation (MST), 1987

Date of birth: 2/25/1958

**Business Experience:**

- Sachetta, LLC
  - 1984 – Present
  - Partner
- Infinite Wealth Management, Inc.
  - 2007 – 2013
  - Principal
- Quest Financial Services, Inc.
  - 1998 – 2007
  - Principal

**Disciplinary Information:** None

**Other Business Activities:** Joe Sachetta serves on the Board of Directors, Everett Co-Operative Bank

**Additional Compensation:** Joseph Sachetta does not receive any additional compensation from third parties for providing investment advice to our clients.

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC, Matthew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138

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**Michael J. Callahan, CPA, CFP®, MST****Educational Background:**

- Merrimack College, Bachelor's Degree in Finance, 2003
- Bentley University, Master's Degree in Taxation (MST), 2009

Date of birth: 2/19/1981

**Business Experience:**

- Sachetta, LLC
  - o Partner, 2011 - Present
  - o Staff Accountant, 2003 - 2011
- Infinite Wealth Management, Inc.
  - o Principal
  - o 2007 – 2013
- Quest Financial Services, Inc.
  - o Financial Advisor
  - o 2002 - 2007

**Disciplinary Information:** None

**Other Business Activities:** None

**Additional Compensation:** Michael Callahan does not receive any additional compensation from third parties for providing investment advice to our clients.

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC, Matthew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138

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**Stephen P. Ahern, CPA/PFS, CFP®, AEP®, MST****Educational Background:**

- Providence College, Bachelor's of Science in Business Administration, Major: Accounting/Computer Science, 1988
- Bentley College, Master's of Science in Taxation (MST), 1998

Date of birth: 5/11/1966

**Business Experience:**

- Sachetta, LLC
  - 2022 – Present
  - President, Founding Member
- Wealth Management Advisors, LLC
  - 2000 – 2021
  - President, Managing Member
- Sullivan Bille PC
  - 2000 – 2021
  - Shareholder/Director
- PricewaterhouseCoopers
  - 1996 – 2000
  - Senior Manager

**Disciplinary Information:** None

**Other Business Activities:** None

**Additional Compensation:** Stephen Ahern does not receive any additional compensation from third parties for providing investment advice to our clients.

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC, Mathew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment eeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138



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**Eric Sachetta, CFP(R), ChFC****Educational Background:**

- Bentley University, Bachelor's Degree in Corporate Finance & Accounting, 2010

Date of birth: 12/06/1987

**Business Experience:**

- Sachetta, LLC
  - Advisor Assistant, 2016 – 2017
  - Financial Advisor, 2017- Present
- E TEAM INC
  - Author, Speaker, Peak Performance Coach 2010 – 2016
- Vector Marketing/Cutco Cutlery
  - District Manager, 2011-2013
  - Pilot Manager, 2010-2011
  - Sales Rep, 2008-2010

**Disciplinary Information:** None

**Other Business Activities:** None

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC, Matthew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138

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**Matthew J. Stead, MSFP****Educational Background:**

- Bentley University, Bachelor's Degree in Finance, 2019
- University of Georgia, Master's Degree in Financial Planning, 2021

Date of birth: 03/30/1997

**Business Experience:**

- Sachetta, LLC
  - Associate Partner, 2019 – Present
  - Advisor Assistant, 2016 – 2019
  - Intern, 2014 – 2016

**Disciplinary Information:** None

**Other Business Activities:** None

**Additional Compensation:** Matthew Stead does not receive any additional compensation from third parties for providing investment advice to our clients.

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC, Matthew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment eeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138

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**Georgios Liakakis, CPA, MSA****Educational Background:**

- University of Massachusetts - Lowell, Bachelor's Degree in Accounting, 2012
- University of Massachusetts - Lowell, Master's Degree in Accounting, 2013

Date of birth: 7/16/1991

**Business Experience:**

- Sachetta, LLC
  - o Associate Partner, 2019 – Present
  - o Staff Accountant, 2016 – 2019
- RSM US, LLP
  - o Assurance Associate, 2014-2016
- Walsh & Company
  - o Intern/Staff Accountant 2011-2014

**Disciplinary Information:** None

**Other Business Activities:** Owner of the Corner Café, Lowell, MA

**Additional Compensation:** Georgios Liakakis does not receive any additional compensation from third parties for providing investment advice to our clients.

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC Matthew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138.

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**Janice D. McGarry****Educational Background:**

- Fisher College, Associate in Science Degree in Business Administration, Science, 1986

Date of birth: 8/2/1959

**Business Experience:**

- Sachetta, LLC
  - 2022 – Present
  - Operations Manager
- Wealth Management Advisors LLC
  - 2010 – 2021
  - Operations Manager
- Colman Knight Advisory Group LLC
  - 2001 – 2010
  - Operations Manager

**Disciplinary Information:** None

**Other Business Activities:** None

**Additional Compensation:** Janice McGarry does not receive any additional compensation from third parties for providing investment advice to our clients.

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC, Matthew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138

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**Jeffrey R. Aron, CFP®, MSFP****Educational Background:**

- Bryant University, Bachelor's Degree in Accounting, 1989
- Bentley University, Master's Degree in Financial Planning, 2010

Date of birth: 10/17/1967

**Business Experience:**

- Sachetta, LLC
  - 2022 – Present
  - Senior Advisor
- Wealth Management Advisors LLC
  - 2013-2021
  - Senior Financial Advisor
- North American Management
  - 2004-2008
  - Vice President, Director of Financial Planning and Estate Planning

**Disciplinary Information:** None

**Other Business Activities:** None

**Additional Compensation:** Jeffrey Aron does not receive any additional compensation from third parties for providing investment advice to our clients.

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC, Matthew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138

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**Domenica M. Lurvey, MSM****Educational Background:**

- Merrimack College, B.A. Economics & Political Science
- Merrimack College, M.S. Business Management

Date of birth: 08/06/1991

**Business Experience:**

- Sachetta, LLC - Financial Advisor
- Harding Financial & Insurance, LLC - Associate Financial Advisor
- Digital Investment Services - Client Services Associate
- Financial Compass Group - Registered Sales Associate
- Shepherd Financial Partners - Financial ParaPlanner
- Putnam Investments - Participant Services Representative

**Disciplinary Information:** None

**Other Business Activities:** None

**Additional Compensation:** Domenica Lurvey does not receive any additional compensation from third parties for providing investment advice to our clients.

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC, Matthew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138.

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**Nicholas Forgione, CPA****Educational Background:**

- University of Massachusetts, Amherst B.A. Accounting 2013
- University of Massachusetts, Amherst M.S. Accounting 2014

Date of birth: 03/14/1991

**Business Experience:**

- Sachetta, LLC – Accountant / Financial; Advisor
- CA Brandt – Accountant
- Fidelity Investments – Accountant

**Disciplinary Information:** None

**Other Business Activities:** None

**Additional Compensation:** Nicholas Forgione does not receive any additional compensation from third parties for providing investment advice to our clients.

**Arbitration Claims:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** As the principals of Sachetta, LLC, Matthew Stead, Michael Callahan and Stephen Ahern determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. All can be reached at (781) 233-4138.