Aturan Capital Management, LLC
Form ADV Part 2A – Brochure
(CRD#: 338443)

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This Form ADV Part 2A brochure ("Brochure") provides information about the qualifications and business practices of Aturan Capital Management, LLC ("the Firm," "we," or "us"). If you have any questions about the contents of this Brochure, please contact us at matthew.engel@aturancapital.com. The information in this brochure has not been approved or verified by any governmental authority, and registration as an investment adviser does not imply any specific level of skill or training.

Additional information about Aturan Capital Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Aturan Capital Management, LLC

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https://www.aturancapital.com

Item 2 – Summary of Material Changes

The Firm has launched a new website (https://www.aturancapital.com) that provides general information about the Firm and allows prospective clients to request appointments or complete a risk-assessment form. The Firm has also updated its primary email address and telephone number. These updates do not affect the Firm's advisory services, fees, or compensation structure.

Item 3 – Table of Contents

Item 4 – Advisory Business

Aturan Capital Management, LLC ("the Firm") is an investment adviser registered with the State of New York. The Firm was formed in 2025 to provide accessible and transparent investment advice to individuals, families, and small businesses.

The Firm is wholly owned by Microbyte Inc., an S-Corporation. Microbyte Inc. is the sole principal owner of Aturan Capital Management, LLC. Microbyte Inc. is wholly owned and controlled by Matthew Engel, who serves as the principal of both entities.

Aturan Capital Management was created with the goal of offering objective, fee-only guidance tailored to the unique needs and preferences of each client. We provide investment advisory and financial consulting services on an hourly basis, allowing clients to seek professional advice without committing to an ongoing portfolio management relationship.

Our advisory process is designed to be collaborative, personalized, and responsive to each client's evolving financial landscape. We begin by meeting with every new client to conduct a comprehensive review of their financial situation, investment experience, and personal goals. This includes identifying specific objectives such as retirement planning, education funding, or wealth accumulation, and evaluating factors such as time horizon, age, liquidity needs, and overall risk tolerance.

Based on this discovery process, we develop a customized investment plan that reflects the client's profile and preferences. Clients may impose restrictions on investing in certain types of securities, such as cryptocurrencies or other asset classes, and these restrictions are incorporated into the plan. The finalized plan is delivered to the client in writing, and it is the client's responsibility to implement the recommendations within their own investment accounts. The Firm does not execute transactions or manage accounts directly.

To ensure that the investment strategy remains aligned with the client's goals and market conditions, we offer optional quarterly or bi-annual check-ins. These follow-up sessions allow us to revisit the plan, assess progress, and make adjustments as necessary based on changes in the client's financial situation, risk tolerance, or investment outlook. Clients may request additional consultations at any time, and we encourage ongoing engagement to maintain the relevance and effectiveness of the plan.

In addition to personalized advisory services, the Firm conducts educational seminars and workshops designed to help individuals better understand investment principles, portfolio construction, and financial goal setting. These seminars and workshops are fee-based, and the applicable fees are described in Item 5 of this Brochure.

Aturan Capital Management does not manage assets on a discretionary or non-discretionary basis and does not take custody of client funds or securities. All investment accounts remain under the client's direct control, allowing the Firm to focus on providing guidance and education that empowers clients to manage their own assets while drawing upon our expertise when needed.

Because the Firm is designed to operate flexibly and with low overhead, we do not maintain a physical walk-in office. Meetings are conducted by telephone, videoconference, or at a mutually agreed upon location by appointment only. This structure allows us to deliver high-quality, client-focused advice in a cost-effective and convenient manner.

Additional information about the firm, including general descriptions of services and contact methods, is available on our website at https://www.aturancapital.com.

Item 5 – Fees and Compensation

Aturan Capital Management, LLC bills for services on an hourly basis. The standard rate for individualized investment advisory and financial planning services is $350 per hour. Fees are negotiable and will be agreed upon in writing before services begin.

Clients may engage the Firm for one-time consultations or for periodic follow-up sessions. Optional quarterly or bi-annual check-ins are available to review progress, reassess goals, and adjust the investment plan as needed. These sessions are billed at the same hourly rate and are scheduled at the client's discretion.

The Firm also conducts educational seminars and workshops designed to help participants better understand investment principles, portfolio construction, and financial goal setting. These sessions are fee-based and billed at $200 per hour for groups of three or more participants. Groups of fewer than three participants are billed at the Firm's standard advisory rate of $350 per hour. Fees for educational seminars and workshops are also negotiable and will be agreed upon in writing prior to the session.

We believe that our hourly model ensures transparency, as clients understand exactly what they are paying for without hidden costs or embedded commissions. Clients are invoiced as services are rendered, and payment is due upon receipt of the invoice.

The Firm does not deduct fees directly from client accounts; clients remain responsible for making payment directly. We do not receive any commissions, referral fees, or third-party compensation in connection with the services we provide. Clients may, however, incur additional costs from custodians, brokers, or investment companies (such as mutual fund expense ratios or brokerage transaction costs). These costs are separate from our advisory fee and are outside of the Firm's control.

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

Aturan Capital Management does not charge performance-based fees. We believe this model ensures that our advice remains objective and not influenced by the potential to earn a share of client profits. Instead, our hourly fee structure aligns our compensation directly with the services we provide rather than the outcome of any investment decisions.

Item 7 – Types of Clients

We primarily serve individuals, including both retail investors and high-net-worth individuals, as well as small businesses and other institutions seeking tailored investment advice. Our clients often include families planning for retirement, professionals seeking guidance on investment choices, and small organizations seeking consultative support in evaluating investment account options. We do not impose a minimum account size, which reflects our commitment to making professional advice accessible to a broad range of investors.

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

Aturan Capital Management employs a multi-faceted approach to investment analysis, combining fundamental, technical, and quantitative methods to develop informed recommendations.

- **Fundamental analysis** may include evaluating company financial statements, earnings reports, industry trends, and broader economic indicators.
- **Technical analysis** may involve studying price momentum, trading volume, volatility patterns, and other market behavior metrics.
- **Quantitative analysis** may be used to model risk, assess probabilities, and identify potential market inefficiencies using statistical and algorithmic tools.

By integrating these approaches, we aim to provide balanced recommendations that consider both long-term fundamentals and short-term market signals.

Investment strategies are developed in the context of each client's individual goals, time horizon, liquidity needs, and tolerance for risk. We emphasize diversification and prudent risk management, tailoring each plan to reflect the client's preferences and any restrictions they may impose (such as excluding certain asset classes or securities). Our recommendations are designed to help clients make informed decisions, and we encourage ongoing engagement to adjust strategies as circumstances evolve.

It is important to understand that all investing involves risk, including the potential loss of principal. Risks may include, but are not limited to:

- General market risk
- Interest rate fluctuations
- Business or sector-specific risks
- Inflation risk
- Liquidity constraints
- Regulatory or geopolitical events

No investment strategy can guarantee profits or prevent losses, and past performance is not indicative of future results. Clients should carefully consider their personal financial situation and work with us to ensure that any recommended strategy aligns with their objectives and risk tolerance.

Item 9 – Disciplinary Information

Aturan Capital Management and its management have no disciplinary events to disclose. We take our fiduciary duty seriously and are committed to maintaining the highest ethical and professional standards.

Item 10 – Other Financial Industry Activities and Affiliations

Aturan Capital Management, LLC is wholly owned by Microbyte Inc., an S-Corporation that provides small business and computer consulting services. Microbyte Inc. is wholly owned and controlled by Matthew Engel, who also serves as the principal of Aturan Capital Management.

These consulting activities are entirely separate from our investment advisory services. Aturan Capital Management does not receive any compensation from Microbyte Inc. for referrals, shared clients, or joint engagements. There are no conflicts of interest between the two entities, and no advisory services are bundled with Microbyte's consulting offerings.

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

Aturan Capital Management has adopted a Code of Ethics pursuant to SEC Rule 204A-1. Our Code of Ethics requires high standards of integrity, fairness, and compliance with all applicable laws and regulations. All personnel are expected to adhere to this Code in every aspect of their work.

A copy of our Code of Ethics is available to clients and prospective clients upon request.

From time to time, the Firm or its personnel may buy or sell for their own accounts securities that are also recommended to clients. These transactions present a potential conflict of interest. To address this, it is our policy that:

- Client interests are placed ahead of the interests of the Firm and its personnel.
- Personal securities transactions are monitored to ensure compliance with the Code of Ethics.
- No employee may favor their own account over client accounts when buying or selling securities.

Neither the Firm nor its personnel have any material financial interest in securities that are recommended to clients. For purposes of this disclosure, ordinary personal investment holdings in publicly traded securities do not constitute a material financial interest.

These safeguards are designed to ensure that any personal trading by the Firm or its personnel does not disadvantage clients.

Item 12 – Brokerage Practices

Aturan Capital Management does not select broker-dealers or direct brokerage for client accounts. Clients are free to maintain accounts at the custodian of their choice and are solely responsible for implementing investment transactions.

The Firm does not maintain any "soft dollar" arrangements and does not receive research or other products or services from broker-dealers in connection with client transactions.

In providing advice, we may review information from a variety of publicly available sources, including financial news publications, market data services, and research providers such as Yahoo Finance, Morningstar, or other independent resources. These sources are used on a non-compensated basis and do not create any conflict of interest with our clients.

Item 13 – Review of Accounts

Aturan Capital Management does not provide ongoing monitoring of client accounts. Our services are delivered on an hourly basis, which means reviews of accounts occur only when specifically requested by the client. This approach provides flexibility for clients to determine the level of engagement that best suits their situation.

Item 14 – Client Referrals and Other Compensation

We do not pay or receive any form of compensation in exchange for client referrals. Our growth is based on the quality of our work and the trust we build with clients rather than referral arrangements or outside incentives.

Item 15 – Custody

Aturan Capital Management does not maintain custody of client assets. Clients maintain direct control of their accounts with the financial institutions of their choice. We believe this structure enhances transparency and ensures that clients retain full authority over their investments.

Item 16 – Investment Discretion

We do not accept discretionary authority over client accounts. Clients are responsible for implementing any recommendations we provide, which ensures they remain fully in control of all investment decisions.

Item 17 – Voting Client Securities

Aturan Capital Management does not vote proxies or other shareholder resolutions on behalf of clients. Clients retain full responsibility for exercising their voting rights and making decisions on corporate governance matters. Proxies and other solicitations will be sent directly to clients by their broker-dealer or custodian. Clients may consult Aturan Capital Management with any questions regarding proxies or solicitations, but the Firm does not provide voting services.

Item 18 – Financial Information

We do not require or solicit prepayment of fees of more than $500 per client for services to be provided six months or more in advance. Aturan Capital Management has no financial condition that would impair our ability to meet contractual commitments to clients. We operate on a financially sound basis, and clients can have confidence in our stability and ability to deliver services as promised.

Item 19 – Requirements for State-Registered Advisers

A. Principal Executive Officers and Management Persons

Matthew Engel is the principal executive officer and management person of Aturan Capital Management, wholly owned by Microbyte, Inc. Information regarding Matthew Engel's education and business background is provided in the Brochure Supplement (Part 2B of Form ADV).

B. Other Business Activities

In addition to his role as principal executive officer of Aturan Capital Management, Matthew Engel is engaged in the following outside business activities:

- **Supervising Programmer Analyst**, Stony Brook University (approximately 38 hours per week)
- **Adjunct Professor of Computer Science**, St. Joseph's University (approximately 4 hours per week)
- **President**, Microbyte Inc. (approximately 6 hours per week)

These activities are unrelated to investment advisory services and do not present a conflict of interest with clients of the firm.

C. Performance-Based Fees

The firm does not charge performance-based fees.

D. Disciplinary Information

Neither the firm nor any management person has been involved in any arbitration, civil, self-regulatory organization, or administrative proceeding of the type described above.

E. Relationships with Issuers of Securities

Neither the firm nor its management persons have any relationship or arrangement with any issuer of securities not already disclosed in Item 10.