

Finaccess Advisors, LLC
Form ADV Part 2A
Investment Adviser Brochure

March 2012

This brochure provides information about the qualifications and business practices of Finaccess Advisors, LLC. If you have any questions about the contents of this brochure, please contact Lauree Cameron Eckler, Chief Operating Officer and Chief Compliance Officer. 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 Finaccess Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2: Summary of Material Changes

Annual Update

This Item of the brochure is updated if material changes have occurred during the course of Finaccess Advisors, LLC's (Finaccess Advisors or the Firm) fiscal year; or with the Finaccess Advisors' Annual Updating Amendment (ADV).

Material Changes since the Last Update

Since the last ADV filing, no material changes have occurred.

Full Brochure Available

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, Finaccess Advisors' Brochure may be requested by contacting Lauree Cameron Eckler, Chief Operating Officer and Chief Compliance Officer at 978-371-7044 or leckler@finaccess.com.

Additional information about Finaccess Advisors is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Finaccess Advisors who are registered, or are required to be registered, as investment adviser representatives of Finaccess Advisors.

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Item 4: Advisory Business

Firm Description and Types of Advisory Services

Finaccess Advisors, LLC, ("Finaccess Advisors") is a registered investment advisor formed in 2009 in the state of Delaware and registered to do business in both Massachusetts and Florida. Finaccess Advisors has offices in Concord, MA and Miami, FL.

Finaccess Advisors is owned by Finaccess Mexico, S.A. de C.V., Sociedad Operadora de Sociedades de Inversion ("Finaccess Mexico"), a corporation incorporated and existing under the laws of the United Mexican States and licensed by the CNBV in Mexico to operate, manage, and distribute mutual funds, with management fees ranging from 80 to 160 basis points. Clients of Finaccess Mexico are both individuals and corporations.

Principal Owners

Finaccess Inversiones, S.A.P.I. de C.V. owns more than 75% of the shares of Finaccess Mexico, S.A. de C.V., Sociedad Operadora de Sociedades de Inversion. Finaccess Mexico, S.A. de C.V., Sociedad Operadora de Sociedades de Inversion ("Finaccess Mexico") is corporation incorporated and existing under the laws of the United Mexican States and licensed by the CNBV in Mexico to operate, manage, and distribute mutual funds, with management fees ranging from 80 to 160 basis points. Clients of Finaccess Mexico are both individuals and corporations. Fideicomiso Irrevocable Trust (Irrevocable Trust) Trust No. F/00728 is the trust that owns Finaccess Inversiones S.A.P.I. de C.V. The Bank of New York Mellon, S.A. Institucion de Banco Multiple is the Trustee for Fideicomiso Irrevocable (Irrevocable Trust) No. F/00728.

Types of Advisory Services

Finaccess Advisors provides investment supervisory services, also known as asset management services; including related financial planning, financial advisory and family office services.

On more than an occasional basis, Finaccess Advisors furnishes advice to clients on matters not involving securities, such as financial planning matters, retirement planning, trust services that often include estate planning and educational services.

We provide personalized confidential financial planning, investment management, financial advisory and family office services to individuals, corporations, trusts and charitable organizations worldwide. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, insurance review, investment management, education funding, retirement planning, estate planning and educational services.

Finaccess Advisors is strictly a fee-only financial planning, investment management, financial advisory and family office services firm. We do not receive commissions for purchasing or selling annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. We are not affiliated with entities that

sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Investment advice is an integral part of financial planning. In addition, Finaccess Advisors advises clients regarding cash flow, college planning, retirement planning and estate planning.

Finaccess Advisors does not act as a custodian of client assets. The client always maintains asset control. Finaccess Advisors places trades for some clients under a limited power of attorney.

The initial meeting with a prospective client 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 prospective client.

Finaccess Advisors' Investment Committee reviews all accounts on a monthly basis or at any time based on the request of an account owner and are responsible for recommending investments based on the client's investment planning objectives and risk tolerance.

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

Types of Agreements

The following agreements define our typical client relationships:

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; 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.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$2,000 and it is negotiable. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments. The fee for financial plans are billed 50% in advance with the balance due upon delivery of the financial plan to the client. The fee is waived for clients who have signed or sign an investment advisory agreement with Finaccess Advisors and have assets to be managed by or currently under management by Finaccess Advisors that exceed \$1,000,000.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve

the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary. Follow-on implementation work is usually not billed.

Investment Advisory Agreement

Most clients choose to have Finaccess Advisors manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their dependent children. 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.

The scope of work and fees for an Investment Advisory Agreement is provided to the client in writing prior to the start of the relationship. An Investment Advisory Agreement includes: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning, as well as the implementation of recommendations within each area.

The Investment Advisory service fee is detailed in the Investment Advisory Agreement signed between Finaccess Advisors and the client and is based on a percentage of the average daily value of investable assets under management, a flat fee or as an agreed upon custodian paid referral fee equal to a percent of the sum of all fees charged by the custodian to the Finaccess Advisors client or received by the custodian for services provided to the Finaccess Advisors client. Fees are charged quarterly and paid in arrears. Fees are negotiable in advance of signing any Investment Advisory Agreement with Finaccess Advisors and may be based on the size of the account, the types of investments to be made, frequency of transactions and/or the services to be provided.

Although the Investment Advisory Agreement is related to an ongoing service and constant adjustments are required, the length of service to the client is at the client's discretion. The client or Finaccess Advisors 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 portfolio average daily value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Financial Advisory Agreement

A Financial Advisory Agreement may be executed between Finaccess Advisors and a client when the client is interested in hiring Finaccess Advisors as its personal CFO. As a personal CFO Finaccess Advisors provides independent review of a clients' current situation, identifies issues which may affect a clients' wealth, proposes possible solutions, and if requested and required, assists in the implementation of the proposed solutions. We do not pretend to have all of the answers but endeavor to ask the right questions in the different areas of wealth management.

Finaccess' intention is not to duplicate the work which has been done by the other hired professionals, but instead to review it. Once we review the work done by other professionals hired by the client, Finaccess Advisors reports to a client our findings -

how specific aspects, policies or practices may affect a client and our recommendations. As our relationship with a client develops, Finaccess Advisors often takes a more proactive role in managing the parts of a client's affairs which both Finaccess Advisors and client agree can be delegated and adequately managed by Finaccess Advisors. Any additional services to be rendered by Finaccess Advisors are reflected in an amendment to the existing Financial Advisory Agreement between Finaccess Advisors and the client or with the execution of a new agreement depending on the services to be provided to the client.

The scope of services to be provided under a Financial Advisory Agreement is provided to the client in writing prior to the start of the relationship. The Financial Advisory services fee is detailed in the Financial Advisory Agreement signed between Finaccess Advisors and the client and is based on a flat fee. Fees are charged quarterly and paid in arrears. Fees are negotiable in advance of signing any Financial Advisory Agreement with Finaccess Advisors and are based on the types of services to be provided.

The client or Finaccess Advisors may terminate a Financial Advisory 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.

Family Office Services Agreement

A Family Office Services Agreement may be executed between Finaccess Advisors and a client when the client is interested in Finaccess Advisors providing the construction and monitoring of individual and consolidated portfolios for family members, assisting in analyzing private equity holdings and investment opportunities, assisting in estate planning, assisting in the analysis and review with tax counsel of tax issues which may affect family members, and assisting in the monitoring and generation of cash flow reports.

The scope of services to be provided under a Family Office Services Agreement is provided to the client in writing prior to the start of the relationship. The Family Office Services fee is detailed in the Family Office Services Agreement signed between Finaccess Advisors and the client and is based on a flat fee. Fees are charged quarterly and paid in arrears. Fees are negotiable in advance of signing any Family Office Services Agreements with Finaccess Advisors and may be based on the types of services to be provided.

The client or Finaccess Advisors may terminate a Family Office Services 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.

Tailored Relationships

Our advisory services are individually tailored to the specific needs, goals and objectives for each client. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Wrap Fee Programs

Finaccess does not participate in a Wrap Fee Program.

Client Assets

As of December 31, 2011, Finaccess manages approximately \$1.769 billion in assets. Approximately \$64.6 million is managed on a discretionary basis, and \$1.704 billion is managed on a non-discretionary basis.

Item 5: Fees and Compensation

Compensation

For a Financial Plan, Finaccess Advisors charges a minimum fee \$2,000 and it is negotiable. The fee for a Financial Plan is waived for clients who have signed or sign an investment advisory agreement with Finaccess Advisors and have assets currently under management or to be managed by Finaccess Advisors that exceed \$1,000,000. Finaccess Advisors' Investment Advisory service fees are based on a percentage of the average daily value of investable assets under management, a flat fee or as an agreed upon custodian paid fee equal to a percent of the sum of all fees charged by the custodian to the Finaccess Advisors client or received by the custodian for services provided to the Finaccess Advisors client. Finaccess Advisors' Financial Advisory service fees and Family Office service fees are based on a flat fee. Fees are negotiable in advance of signing any Financial Planning Agreement, Investment Advisory Agreement, Financial Advisory Agreement or Family Office Services Agreement with Finaccess Advisors and may be based on the size of the account, the types of investments to be made, the frequency of transactions and/or the services to be provided.

Fee Billing

Fees for Investment Advisory Services, Financial Advisory Services and Family Office services are invoiced quarterly and paid in arrears, meaning that we invoice our clients after a three-month billing cycle has ended. Client's either sign standing letters of authorization with a specific custodian authorizing the custodian to deduct Finaccess Advisors' fees from a designated account, send a check directly to Finaccess Advisors or provide a custodian with signed wire instructions authorizing the custodian to wire Finaccess Advisors' fees directly into Finaccess Advisors designated income account.

Fees for Financial Planning are billed 50% in advance, with the balance due upon delivery of the financial plan to the client.

Calculation and Payment

The specific manner in which fees are charged by Finaccess Advisors is established in a client's written agreement with Finaccess Advisors. Fees are calculated in arrears on a quarterly basis. Clients may elect to be invoiced directly for fees or to authorize Finaccess Advisors to directly debit fees from client accounts.

Management fees may be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals).

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying Finaccess Advisors in writing and paying the agreed upon fee detailed in the particular agreement signed between Finaccess Advisors and the client. At termination, Investment Advisory Service, Financial Advisory Service and Family Office Service fees will be billed on a pro rata basis for the portion of the quarter completed. Fees for Financial Plans are billed at 50% in advance and 50% due upon delivery of the financial plan to the client. Depending on when the client requesting a financial plan decided to terminate the agreement, Finaccess would refund all or a portion of the fees for the financial plan.

Finaccess Advisors may terminate any of the aforementioned agreements at any time by notifying the client in writing. At termination, Investment Advisory Service, Financial Advisory Service and Family Office Service fees will be billed on a pro rata basis for the portion of the quarter completed. Fees for Financial Plans are billed at 50% in advance and 50% due upon delivery of the financial plan to the client. Depending on when notified by the client of their intention to terminate the Financial Planning Agreement, Finaccess would refund all or a portion of the fees for the financial plan.

Finaccess Advisors reserves the right to terminate any engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Finaccess Advisor's judgment, to providing proper financial advice.

Other Compensation

Neither Finaccess Advisors nor any of its supervised persons (employees) accept compensation for the sale of securities or other investment products.

General Information on Compensation and Other Fees

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

Finaccess Advisors' fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to Finaccess Advisors' fee, and Finaccess Advisors shall not receive any portion of these commissions, fees, and costs.

All fees paid to Finaccess Advisors for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and variable annuity sub-accounts to their shareholders. These fees and expenses are described in each fund's or sub account's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

A client could invest in a mutual fund or sub-account directly, without the services of Finaccess Advisors. In that case, the client would not receive the services provided by Finaccess Advisors which are designed, among other things, to assist the client in determining which mutual funds or sub-accounts are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds/sub-accounts and the fees charged by Finaccess Advisors to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

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

Performance-Based Fees

Neither Finaccess Advisors nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Finaccess Advisors 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.

Item 7: Types of Clients

Types of Clients

As described in Item 4, Finaccess Advisors provides investment advice to individuals, corporations, trusts and charitable organizations worldwide.

Client relationships vary in scope and length of service.

Account Minimums

Finaccess Advisors does not provide financial planning, investment advisory services, financial advisory or family offices services that require a minimum dollar value of assets under management.

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

Methods of Analysis

Finaccess Advisors may employ the following security analysis methods: Fundamental analysis; charting/technical analysis; and cyclical analysis.

Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is under priced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

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.

Charting/Technical Analysis. The terms “charting” and “technical” analysis are generally used synonymously and therefore, for the purpose of this document, the term, “technical analysis” will be used. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

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.

Cyclical Analysis. In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Investment Strategies

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.

Other strategies may include long-term purchases, short-term purchases and trading.

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.

Item 9: Disciplinary Information

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

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

Finaccess Advisors is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither Finaccess Advisors nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Financial Industry Affiliations

Finaccess Advisors is owned by Finaccess Mexico, S.A. de C.V., Sociedad Operadora de Sociedades de Inversion ("Finaccess Mexico"), a corporation incorporated and existing under the laws of the United Mexican States and licensed by the CNBV (National Banking and Securities Commission) in Mexico to operate, manage, and distribute mutual funds. Clients of Finaccess Mexico are both individuals, for profit and non-profit corporations and government entities. There is no conflict between any of Finaccess Advisors' clients and Finaccess Mexico's client.

Helios Advisors, LLC. is hedge fund manager owned and managed in part by Mario Covo and Gabriel Tolchinsky who are also members of Finaccess Advisors' Investment Committee. Helios Advisors does not solicit any investments from any of Finaccess Advisors clients.

Potential conflicts of interest are disclosed to the client in the unlikely event they should arise.

Other Investment Advisors

While Finaccess Advisors may recommend or select other investment advisors for its clients, Finaccess Advisors does not receive any compensation for the recommendation.

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

Code of Ethics

Finaccess Advisors employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Lauree Cameron Eckler, Chief Operating Officer and Chief Compliance Officer reviews all employee trades each quarter.

Finaccess Advisors' employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of Finaccess Advisors' Code of Ethics by contacting Lauree Cameron Eckler at 978-371-7044.

Participation or Interest in Client Transactions – Personal Securities Transactions

Finaccess Advisors and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of Finaccess Advisors will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Finaccess Advisors' clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and designed to reasonably prevent conflicts of interest between Finaccess Advisors and its clients.

Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross

Finaccess Advisors and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

It is Finaccess Advisors' policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. Finaccess Advisors will also not cross trades between client accounts.

Participation or Interest in Client Transactions – Aggregation

Finaccess Advisors and its employees may trade in the same securities with client accounts on an aggregated basis when consistent with Finaccess Advisors' obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Finaccess Advisors will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

Finaccess does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in “Directed Brokerage – Other Economic Benefits”.

Brokerage for Client Referrals

Finaccess does not receive client referrals from broker/dealers.

Directed Brokerage

Finaccess Advisors does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. Finaccess Advisors recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Finaccess Advisors does not receive fees or commissions from any of these arrangements.

Best Execution

Finaccess Advisors in seeking to obtain the best execution of portfolio transactions, may consider the quality and reliability of brokerage services, as well as research and investment information and other services provided by brokers and dealers. Factors considered by Finaccess Advisors in selecting brokers and dealers may include the following: price, the broker's or dealer's facilities, reliability and financial responsibility; the ability of the broker or dealer to effect securities transactions, particularly with regard to such aspects as complexity of the trade, timing, order size and execution of orders; and the research and other services provided by that broker or dealer to Finaccess Advisors that are expected to enhance our general portfolio manager capabilities, notwithstanding that a client may not be the direct or exclusive beneficiary of such services. Commission rates, being a component of price, are one factor considered together with other factors. Accordingly, Finaccess Advisors in its discretion, may cause a client to pay a commission for effecting a transaction that may be in excess of the amount another broker would have charged for effecting that same transaction and this may be done where we have determined in good faith that the commission is reasonable in relation to the value of the brokerage and/or research services provided by the broker or dealer to our client(s).

Directed Brokerage – Other Economic Benefits

Finaccess Advisors may receive from broker/dealers, at no cost to Finaccess Advisors, professional services, computer software and related systems support, enabling Finaccess Advisors to better monitor client accounts maintained at Schwab. Finaccess Advisors may receive this support without cost because of the portfolio management services rendered to clients that maintain assets at Schwab. The support provided may

benefit Finaccess Advisors, but not its clients directly. In fulfilling its duties to its clients, Finaccess Advisors endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Finaccess Advisors' receipt of economic benefits from a broker-dealer may create a conflict of interest since these benefits may influence Finaccess Advisors' choice of broker-dealer over another broker-dealer that does not furnish similar services, software and systems support.

The commissions paid by Finaccess Advisors's clients shall comply with Finaccess Advisors's duty to obtain "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Finaccess Advisors determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while Finaccess Advisors will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

Trade Aggregation

Finaccess Advisors does not aggregate or block trades.

Item 13: Review of Accounts

Reviews

Finaccess Advisors' Investment Committee reviews all accounts on a monthly basis, more frequently when market conditions dictate or at any time upon request of the client. Finaccess Advisors' Investment Committee is responsible for recommending investments based on a client's investment planning objectives and risk tolerance. There are seven (7) members of Finaccess Advisors' Investment Committee: Robert Rodriguez, Javier Lopez Casado, Luis Cervantes, Mario Covo, Gabriel Tolchinsky, Miguel Alvarez and Pablo Septien.

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

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.

Reporting

Clients receive periodic communications on at least an annual basis. Investment Advisory Agreement clients receive quarterly portfolio reviews and may request an additional portfolio review at any time.

Financial Planning – Reviews and Reporting

Financial Planning clients will be reviewed and receive reports as contracted for at the inception of the engagement.

Item 14: Client Referrals and Other Compensation

Other Compensation

Finaccess Advisors does not receive any economic benefits (other than normal compensation and benefits described in Item 12) from any firm or individual for providing investment advice.

Compensation – Client Referrals

Finaccess Advisors 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. The firm does not compensate referring parties for these referrals.

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

Item 15: Custody

Custody – Fee Debiting

Clients may authorize Finaccess Advisors (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). Client investment assets will be held with a custodian agreed upon by the client and Finaccess Advisors. The custodian is advised in writing of the limitation of Finaccess Advisors' access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to Finaccess Advisors.

Custody – Account Statements

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. All assets are held at qualified custodians and the custodians provide monthly account statements directly to clients at their address of record, by secure email or with password protected online access. At the discretion of the client, Finaccess Advisors is provided with copies of monthly statements or given password protected online access to statements. Finaccess also utilizes account aggregation software to access the daily activity and performance of many of its clients. The availability of a clients daily activity and performance is dependent upon the clients custodian and the availability of a data feed to the account aggregation entity utilized by Finaccess Advisors

Clients are urged to carefully review such statements and compare such official custodial records to the reports that Finaccess Advisors provides. Finaccess Advisors reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

Finaccess Advisors has both non-discretionary and discretionary relationships with its clients.

For those clients that have chosen to sign discretionary Investment Advisory Agreements, we accept discretionary authority to manage securities accounts on behalf of clients and determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

For those clients that have chosen to sign non-discretionary Investment Advisory Agreements we will make recommendations to the client and, if client decides to accept such recommendations, client will directly execute the recommendations via signed written instruction provided to the custodian.

In all client relationship, the client approves the custodian to be used and the commission rates paid to the custodian.

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.

Item 17: Voting Client Securities

Finaccess Advisors does not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for securities maintained in their portfolios; clients receive these proxies directly from either custodians or transfer agents.

If requested, Finaccess Advisors may provide advice to clients regarding proxy votes. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Lauree Cameron Eckler at 978-371-7044 for information about proxy voting.

Item 18: Financial Information

Finaccess Advisors has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Finaccess Advisors does not require prepayment of fees of both more than \$1,200 per client, **and** more than six months in advance; and therefore is not required to provide a balance sheet to clients.

Finaccess Advisors, LLC
Form ADV Part 2B
Investment Adviser Brochure Supplement

Supervisor: Lauree Cameron Eckler

Supervisor of:
Robert Rodriguez
Javier Lopez Casado
Mario Covo
Natalio Gabriel Tolchinsky
Luis F. Cervantes
Miguel Álvarez del Río
Pablo J. Septien Vélez

March 2012

This brochure supplement provides information about the Firm's Supervised Persons that supplements the Finaccess Advisors, LLC's brochure. You should have received a copy of that brochure. Please contact Lauree Cameron Eckler, Chief Operating Officer and Chief Compliance Officer if you did not receive Finaccess Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at www.adviserinfo.sec.gov.

37 Main Street
Concord, MA 01742
978-371-7044
978-405-5011
lceckler@finaccess.com

Educational Background and Business Experience

Education and Business Background

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

Supervised Persons

Lauree Cameron Eckler

Born: 1964

Education:

B.A. University of Maine

M.B.A. The Olin School of Management

Professional Background:

2004-2009: Chief Compliance Officer, Wealth Mgmt, Finaccess International, Inc.

2009-Present: Chief Operating Officer/Chief Compliance Officer, Finaccess Advisors, LLC

Robert Rodriguez

Born: 1957

Education:

B.A. Boston University

M.A. Boston University

M.B.A. The Wharton School

Professional Background:

1980-1982: Bank of Boston, Loan Officer Development Program

1982-1985: Loan Officer Marine Midland Bank

1987-1991: Vice President, Emerging Markets, Bankers Trust Co.

1991-2004: Vice President, Emerging Markets, J.P. Morgan

2004-2009: Managing Director, Wealth Mgmt, Finaccess International, Inc.

2009-Present: Chief Executive Officer, Finaccess Advisors, LLC.
Investment Committee, Finaccess Advisors, LLC.

Javier Lopez Casado

Born: 1968

Education:

J.D., Universidad Complutense de Madrid

M.A. Legal and Tax Advisory for Corporations, Univ. Politécnica de Madrid

M.B.A. University of Miami

Professional Background:

1992-1994: Jr. Lawyer, Bufete de Abogados Hernández-Canut
1995-1996: Lawyer, Bufete Iberoamericano de Negocios
1996-1997: Private Banking Officer Latin America, Banco Santander
1997-1999: Asst. V.P. Priv. Banking Latin America, Banco Santander Central Hispano Int'l.
1999-2003: V.P. Private Banking Family Office, Banco Santander Central Hispano Int'l.
2003-2008: Sr. Banker Family Office, Grupo Santander - Santander Private Banking
2008-2010: Sr. V.P. Private Wealth, Banco Santander Int'l-Miami
2010-Present: Managing Director, Finaccess Advisors, LLC.
Investment Committee, Finaccess Advisors, LLC.

Mario Covo

Born: 1957

Education:

B.A. Instituto Tecnológico Autónomo de México
Ph.D. Rice University

Professional Background:

1989-1995: Managing Director, Merrill Lynch & Co.
1995-1999: Principal, Columbus Advisors, LLC.
2002-Present: Principal, Helios Advisors, LLC.
1999-2009: CEO and President, Finaccess International, Inc.
2009-Present: Investment Committee, Finaccess Advisors, LLC.

Natalio Gabriel Tolchinsky

Born: 1951

Education:

B.S. Tel-Aviv University (Israel)
M.S., M.A. Columbia University

Professional Background:

1991-1995: Director Emerging Markets, Merrill Lynch & Co.
1995-1999: Principal, Columbus Advisors, LLC.
2002-Present: Principal, Helios Advisors, LLC.
1999-2009: Chief Operations Officer, Finaccess International, Inc.
2009-Present: Investment Committee, Finaccess Advisors, LLC.

Luis F. Cervantes

Born: 1954

Education:

B.S., Industrial Engineering, Universidad Iberoamericana,
M.B.A., Stanford University

Professional Background:

1977-1978: Systems Assistant Manager, Multibanco Comermex, S.A.
1978-1980: Investment Bank Manager, Multibanco Comermex, S.A.
1982-1984: President V.P., Citibank, N.A.
1984-1986: V.P., Citibank, N.A.
1986-1988: President of Business Development, Citibank, N.A.
1988-1990: Executive V.P. Investment Banking, Multivalores Grupo Financiero, S.A. de C.V.
1990-1993: Partner and CEO Multivalores Casa de Bolsa, Multivalores Grupo Financiero, S.A. de C.V.
1993-1996: Partner and CEO Multivalores Financial Gp., Multivalores Grupo Financiero, S.A. de C.V.
1996-1999: Founder, Chair and CEO, Cervantes Asociados, S.A. de C.V.
2000-2009: Founder, Finaccess International, Inc.
Chairman and CEO, Finaccess Mexico S.A. de C.V.
2009-Present: Chairman, Finaccess Mexico S.A. de C.V.
Investment Committee, Finaccess Advisors, LLC.

Miguel Álvarez del Río

Born: 1955

Education:

B.S., Industrial Engineering, Universidad Iberoamericana
M.B.A., Columbia University

Professional Background:

1977-1978: Analyst and Project Manager, Santalo, Estudios Y Protectos
1980-1985: International Financing Manager, Banca Serfin, S.A.
1985-1988: V.P. Corporate Banking, Banco Serfin, S.A.
1988-1990: E.V.P. Corporate, Public Sector and International Banking
1990-1992: E.V.P. Mexico, Vector, Casa de Bolsa, S.A. de C.V.
1992-1994: E.V.P. Corporate and International Banking, Bancrecer, S.A.
1994-1995: CEO, Bancrecer, S.A.
1995-1998: Managing Director, Santander Investment, Banco Santander de Negocios
1998-2000: Managing Director, Grupo Financiero Santander Mexico
2000-2009: Managing Director, Finaccess Mexico S.A. de C.V.
2009-Present: CEO, Finaccess Mexico S.A. de C.V.
Investment Committee, Finaccess Advisors, LLC

Pablo J. Septien Vélez

Born: 1967

Education:

B.A., Instituto Tecnológico Autónomo de México

Professional Background:

1986-1992: Manager Debt Markets, Grupo Bursatil Mexicano

1992-1998:	Vice President Emerging Markets, Merrill Lynch & Co.
1998-2001:	Principal, Administradora Internacional de Portafolios
2001-Present:	Chief Portfolio Manager, Finaccess Mexico, S.A. de C.V. Investment Committee, Finaccess Advisors

Disciplinary Information

Neither Finaccess Advisors nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations above. These Outside Business Activities do not create a material conflict of interest with clients.

As disclosed in Form ADV Part 2A Item 5 – Fees and Compensation, neither Finaccess Advisors nor any Supervised Persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Additional Compensation

No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

Supervision

Lauree Cameron Eckler, Chief Operating Officer and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Lauree Cameron Eckler supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Lauree Cameron Eckler regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Lauree Cameron Eckler may be reached at 978-371-7099.