

ALPHA GENESIS CAPITAL LLC

355 ALHAMBRA CIRCLE SUITE 1550

CORAL GABLES, FLORIDA 33134

786 866 3700

April 8, 2015

This Brochure provides information about the qualifications and business practices of Alpha Genesis Capital LLC (“AGC”). If you have any questions about the contents of this Brochure, please contact us at 786 866 3700. 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.

AGC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

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

Item 2 -Table of Contents

| | |
|--|----|
| Item 1 – Cover Page..... | i |
| Item 2 -Table of Contents | ii |
| Item 3 – Advisory Business | 1 |
| Item 4 – Fees and Compensation | 1 |
| Item 5 – Performance-Based Fees and Side-By-Side Management..... | 2 |
| Item 6 – Types of Clients..... | 2 |
| Item 7 – Methods of Analysis, Investment Strategies and Risk of Loss | 2 |
| Item 8 – Disciplinary Information..... | 6 |
| Item 9 – Other Financial Industry Activities and Affiliations | 6 |
| Item 10 – Code of Ethics, Participation or Interest in client Transactions and Personal Trading..... | 7 |
| Item 11 – Brokerage Practices | 9 |
| Item 12 – Review of Accounts | 9 |
| Item 13 – <i>Client</i> Referrals and Other Compensation | 9 |
| Item 14 – Custody..... | 9 |
| Item 15 – Investment Discretion..... | 9 |
| Item 16 – Voting <i>Client</i> Securities | 9 |
| Item 17 – Financial Information | 10 |
| Item 18 – Requirements for State-Registered Advisers..... | 10 |
| Brochure Supplement(s) | |

Item 3 – Advisory Business

BRIEF DESCRIPTION

Alpha Genesis Capital LLC (“AGC”) is a limited liability company established on July 11, 2013 and incorporated in FL. AGC’s principal place of business is 355 Alhambra Circle, Suite 1550, Coral Gables, FL 33134 and is 60% owned by RGP2 LLC and 40% PATISA Consulting LLC.

ASSETS UNDER MANAGEMENT

AGC does not have any assets under management at this time.

ADVISORY SERVICES PROVIDED

AGC provides marketing and administrative functions for its affiliated funds.

WRAP FEE PROGRAMS

AGC does not participate in wrap fee programs.

Item 4 – Fees and Compensation

All fees are subject to negotiation.

The specific manner in which fees are charged by AGC is established in the Offering Memorandum of AGC’s affiliated Investment Funds or in a client’s written agreement with AGC, if applicable. AGC will receive fees from its affiliated funds on a monthly basis. Alternatively, clients may be billed in arrears, each calendar quarter based on the market value of the client’s assets advised by AGC. In the event that clients are not billed directly by the fund for fees, they will be billed by AGC.

AGC’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the affiliated fund or the client, as applicable.

Item 5 – Performance-Based Fees

In some cases AGC will receive performance fees based on the affiliated or contracted funds' performance. For more information on the calculation of the performance fees of the affiliated or contracted funds, please see the fund's memorandum or brochure.

Performance fees will not be assessed on clients. Performance fees that are paid can be an incentive to the AGC's marketers in its marketing efforts thereby creating a conflict between the interest of the marketer and the affiliate or contracted fund.

Item 6 – Types of Clients

AGC provides services to the following, but is not limited to them:

- Affiliated Funds

Item 7 – Methods of Analysis, Investment Strategies and Risk of Loss

METHOD OF ANALYSIS AND SOURCES OF INFORMATION

Generally, the methods of analysis, sources of information and investment strategies will be determined by the investment managers. AGC will not be analyzing investment data and information.

INVESTMENT STRATEGIES

AGC will not make investment decisions, provide investment strategies or make recommendations to the affiliated funds.

Investment decisions made by the affiliated fund's investment managers, can include but are not limited to, the following types of strategies

- Long-Term Purchases (securities held at least one year)
- Short-Term Purchases (securities sold within one year)
- Trading (securities sold within 30 days)
- Short sales
- Margin Transactions

The funds may invest in non US bonds, non US equities, non investment grade securities, Eurobonds or similar securities, including Emerging Markets securities. Some of these securities may be illiquid and not have a readily available market.

Third party money managers used to manage the investments in some cases will be affiliates of AGC including Genesis Fund Management (“GFM”). The selection of GFM is based on GFM’s expertise, knowledge and track records managing investments. AGC has procedures designed and implemented to ensure that conflicts between GFM or any other affiliated fund manager and AGC are monitored.

Risks – The chance that an investor will lose all or part of an investment. A list of all risks associated with the strategies, products and methodology we offer are listed below:

1. Overall Fund Risk

- Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.
- Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.
- While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

2. Bond Fund Risk

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields of the risks associated with bond funds include:

- Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

3. Stock Fund Risk

Although a stock fund's value can rise and fall quickly over the short term, historically stocks have performed better over the long term than other types of investments — including corporate bonds, government bonds, and treasury securities.

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

Not all stock funds are the same. For example:

- Growth funds focus on stocks that may not pay a regular dividend but have the potential for large capital gains.
- Income funds invest in stocks that pay regular dividends.
- Index funds aim to achieve the same return as a particular market index, such as the S&P 500 Composite Stock Price Index, by investing in all — or perhaps a representative sample — of the companies included in an index.

- Sector funds may specialize in a particular industry segment, such as technology or consumer products stocks.

4. Fundamental Analysis Risk

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- When using this method with mutual funds, the funds are composed of many companies and not all of them will be undervalued
- The data used may be at least six months out of date.
- It is difficult to give appropriate weightings to the factors.
- In the early 1970s and 1980s price/earnings multiples of 80 or 90 were considered acceptable by some for 'blue chip' stocks in the United States.
- In the 1980s in the United States some biotechnology stocks sold at '50 times sales'. The companies had no earnings and paid no dividend. The new yardstick to value these became 'products in the pipeline'. By the late 1980s most had lost three-quarters of their stock price.
- It assumes that the analyst is competent.
- A fundamental analyst assumes that other fundamental analysts will form the same view about the company and buy the stock, thus restoring its value and returning the trader or investor a capital gain. In practice, an undervalued company's stock price can stay at approximately the same level (or decline) for years.
- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.
- It assumes that there is no monopolistic power over markets.

- Even when fundamental analysis reveals an undervalued company, or a stock with high growth prospects, it does not tell us anything about the timing of the purchase of the stock. In other words, we may have discovered a grossly undervalued stock whose price has been falling for some time, and may well continue falling.

Item 8 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of AGC or the integrity of AGC’s management. AGC has no information applicable to this Item.

Item 9 – Other Financial Industry Activities and Affiliations

OTHER FINANCIAL INDUSTRY ACTIVITIES

- AGC is not actively engaged in a business other than administrative functions for affiliates and market of the funds.
- AGC does not sell products or services
- The principal business of AGC does not involve anything other than providing administrative and marketing functions. AGC’s principal executives are also actively involved in the operations of AGC’s affiliated entities.

AFFILIATIONS

AGC and Genesis Investment Advisors LLC (“GIA”) and Genesis Fund Management (“GFM”) are advisory affiliates and related persons both controlled and owned by RGP2 LLC, a holding company. To the extent that RGP2 LLC controls the entities and clients of GIA may invest in funds affiliated to AGC, an indirect benefit may be inferred. Please see Item 5 – Fees and Compensation for a full review of AGC’s fees. GIA and GFM may charge assets under management, performance, hourly, flat, a combination of any and other fees.

AGC has employees that are dually registered with its affiliates GIA and GFM. AGC has policies in place to ensure conflicts associated with employees with affiliate firms are effectively managed.

Item 10 – Code of Ethics, Participation or Interest in client Transactions and Personal Trading

CODE OF ETHICS

It is the policy of AGC that all investment advisory services and related activities comply fully with the provisions of the Investment Advisers Act of 1940 (“Advisers Act”) and the rules and regulations there under, and other applicable federal and state laws.

AGC has a fiduciary duty to its clients. It is of the greatest importance that our clients never have reason to doubt their decision to place their faith and confidence in us. Any action that can cause that decision to be questioned jeopardizes the future of AGC and its employees. If an employee becomes aware of any activities that he/she believes may be in violation of the law or the policies of AGC, it is their responsibility to pass this information on to his/her supervisor or the Chief Compliance Officer.

The purpose of AGC’S Code of Ethics, wherein AGC’S Personal Securities Transactions Policy Statement is incorporated by reference, is to maintain high standards of ethical conduct for AGC and its personnel. In so doing, this Code of Ethics addresses the following: STANDARD OF CARE, SUITABILITY, CONFIDENTIALITY, CONFLICTS OF INTEREST, SUPERVISORS’ ROLES, PERSONAL SECURITIES TRANSACTIONS REPORTING REQUIREMENTS, GIFTS AND ENTERTAINMENT, OUTSIDE BUSINESS ACTIVITIES, INSIDER TRADING, PROHIBITED ACTIVITIES, and CONSEQUENCES OF CODE VIOLATIONS. AGC’S CODE OF ETHICS is available to all clients upon their request.

Any reference to AGC’S Code of Ethics below incorporates AGC’S Personal Securities Transactions Policy Statement also. All AGC employees must acknowledge the terms of the Code of Ethics and Personal Securities Transactions Policy Statement at the beginning of their employment and annually thereafter. The officers and employees of AGC may own securities in which AGC invests for clients.

AGC’S employees and persons associated with AGC are required to follow AGC’S Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of AGC and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for affiliate clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of AGC 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 have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of AGC' clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. 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 to reasonably prevent conflicts of interest between AGC and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with AGC'S 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. AGC 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.

It is AGC'S policy that the firm will not affect any principal or agency cross securities transactions for client accounts. AGC will also not cross trades on an agency basis between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

AGC is affiliated with GIA and GFM and has dually registered employees. AGC will provide marketing and administrative services for its affiliated funds and will receive fees based on its efforts. AGC has reasonable policies in place to ensure conflicts of interest, supervisory roles and all other parts related to its Code of Ethics are effectively monitored.

Item 11 – Brokerage Practices

AGC will be acting in a marketing and administrative capacity and will not be using broker dealers for its business at this time.

Item 12 – Review of Accounts

AGC will be acting in a marketing and administrative capacity and will not have customers for accounts to be reviewed.

Item 13 – *Client* Referrals and Other Compensation

AGC will enter into arrangements with third parties whereby AGC pays them to solicit investors to invest in the affiliated funds. Note that such solicitations are not for the purpose of entering into advisory contracts with AGC and are all conducted offshore to Non US Persons as that term is defined in Regulations S of the 1933 Act.

Item 14 – Custody

AGC does not have custody of client accounts.

See Item 13., Review of Accounts.

Item 15 – Investment Discretion

AGC will not make investment decisions and will not have discretionary authority over customer's accounts.

Item 16 – Voting *Client* Securities

All voting and client proxies will be handled directly by the Fund Administrators. AGC will have no involvement in this process.

Item 17 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about AGC’s financial condition. AGC 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.

Item 18 – Requirements for State-Registered Advisers

AGC only is registered with the Securities and Exchange Commission and is not a state registered adviser. However, AGC does provide Florida with a notice filing.

April 8, 2015



ALPHA GENESIS CAPITAL LLC

355 ALHAMBRA CIRCLE SUITE 1550

CORAL GABLES, FLORIDA 33134

786 866 3700

April 8, 2015

BROCHURE SUPPLEMENTS

Item 1- Cover Page

RODRIGO REGO

Alpha Genesis Capital LLC
("AGC")

355 Alhambra Circle, Suite 1550
Coral Gables, FL 33134
786 866 3700

April 8, 2015

This Brochure Supplement provides information about Rodrigo Rego that supplements the AGC Brochure. You should have received a copy of that Brochure. Please contact AGC, Chief Compliance Officer at 786 866 3700 if you did not receive AGC Brochure or if you have any questions about the contents of this supplement.

Additional information about AGC available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

- Born 1964

Education

- B.A. Pontificia Universidade Catolica de Sao Paulo

Business Background

- Genesis Investment Advisors LLC
 - Chief Executive Officer (01/01/15 – Present)
- Genesis Investment Advisors LLC
 - Managing Director (04/01/05 – 12/31/14)
- Genesis Fund Management LLC
 - Chief Executive Officer (06/2010 – Present)
- BSI Investment Advisors LLC
 - First Vice President (01/01/03– 03/31/05)
 - Vice President (07/01/00 – 12/31/02)
- BSI AG, New York Branch
 - Vice President, Portfolio Manager, Private Banking (1996 – 06/30/00)
- Banco Nacional S.A.

- New York Agency, Private Banking Officer (1993 - 1996)

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Rodrigo Rego is the Chief Executive Officer of AGC's affiliate entities Genesis Investment Advisors ("GIA") and Genesis Fund Management ("GFM").

Item 5- Additional Compensation

None

Item 6 - Supervision

Ultimately, the Chief Executive Officer is responsible for complete oversight of AGC activity. Through delegation to the Chief Compliance Officer ("CCO"), the CCO reviews all trades and enforces adherence to applicable laws, regulations and firm policies regarding discharge of the supervised person's duties. The use of a portfolio management system is employed as part of a surveillance program. Suspected violations are referred to the proper channels within the firm for further investigation and, if necessary, disciplinary action.

Rodrigo Rego - Chief Executive Officer – 786 866 3700

Don Lee - Chief Compliance Officer – 786 866 3700

Item 7- Requirements for State-Registered Advisers

Rodrigo Rego is currently registered as an associated person with the Florida Division of Securities and Finance.

Item 1- Cover Page

Patricio Diez Romero- Valdespino

Alpha Genesis Capital LLC
("AGC")

355 Alhambra Circle, Suite 1550
Coral Gables, FL 33134
786 866 3700

April 8, 2015

This Brochure Supplement provides information about Patricio Diez Romero-Valdespino that supplements the AGC Brochure. You should have received a copy of that Brochure. Please contact AGC, Chief Compliance Officer at 786 866 3700 if you did not receive AGC 's Brochure or if you have any questions about the contents of this supplement.

Additional information about AGC available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

- Born 1959

Education

- J.D. Universidad Complutense de Madrid, Spain (1983)
- M.B.A.- E.M.I.B. EAP (Ecole des Affaires de Paris, France (1993)

Business Background

- Alpha Genesis Capital Ltd
 - Founding and Managing Partner (12/2007 – Present)
- Alpha Genesis Global Value Fund
 - Director (12/2007 – Present)
- Eurocapital Advisors, LLC
 - Founding and Managing Partner (01/2003 – Present)
- Donaldson, Lufkin and Jenrette (later Credit Suisse First Boston)
 - Vice President, Investment Services Group (05/2000 – 12-2002)
- Banco Santander Central Hispano International
 - Vice President, Private Banking, Brazilian Market (1996 - 2000)
- Indosuez Capital Securities, S.V.B., S.A., Madrid
 - Director (1994 - 1996)
- Bestinver, S.V.B., S.A., Madrid

- Director. Member of the Board and of the Executive Committee Responsible for major International Accounts (1991 – 1994)
 - ABA, S.A., Madrid
 - Head of the International Department (1988 – 1991)
 - Midland Bank PLC, Madrid
 - Capital Markets Department, International Division (1987 – 1988)
 - Amhurst, Brown, Martin and Nicholson
- Assistant to the Spanish Department Director (1984 – 1987)

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Patricio Diez Romero- Valdespino is the co-owner of Eurocapiial Advisors, LLC a SEC Registered Investment Advisor.

Item 5- Additional Compensation

None

Item 6 - Supervision

Ultimately, the Chief Executive Officer is responsible for complete oversight of AGC activity. Through delegation to the Chief Compliance Officer (“CCO”), the CCO reviews all trades and enforces adherence to applicable laws, regulations and firm policies regarding discharge of the supervised person’s duties. The use of a portfolio management system is employed as part of a surveillance program. Suspected violations are referred to the proper channels within the firm for further investigation and, if necessary, disciplinary action.

Rodrigo Rego - Chief Executive Officer – 786 866 3700

Don Lee - Chief Compliance Officer – 786 866 3700

Item 7- Requirements for State-Registered Advisers

Not applicable.

Item 1- Cover Page

RONALDO LYRIO

Alpha Genesis Capital LLC
("AGC")

275 Madison Avenue, Suite 3800
New York, New York 10016
212 326 3100

355 Alhambra Circle, Suite 1550
Coral Gables, FL 33134
786 866 3700

April 8, 2015

This Brochure Supplement provides information about Ronaldo Lyrio that supplements the Genesis Brochure. You should have received a copy of that Brochure. Please contact Genesis, Chief Compliance Officer at 786 866 3700 if you did not receive Genesis' Brochure or if you have any questions about the contents of this supplement.

Additional information about Genesis available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

- Born 1967

Education

- B.A Pontificia Universidade Catolica of Rio de Janeiro, (1986 – 1989)

Business Background

- Genesis Investment Advisors LLC
 - Chief Investment Strategist (10/2010 – Present)
- Genesis Fund Management LLC
 - Chief Investment Strategist (10/2010 – Present)
- Comitto Capital LLC
 - Founder (10/2008 – 10/2010)
- The Rohatyn Group (TRG Management)
 - Senior Portfolio Manager (04/2004 – 10/2008)
- Barclays Capital Inc.
 - Senior Vice President (01/2002-04/2004)
- RBS (formerly Natwest Securities)

- Executive Director (09/1998-01/2002)
- Banque Paribas
 - Executive Director (05/1998-09/1998)
- UBS
 - Executive Director (08/1996-05/1998)
- J.P. Morgan
 - Vice President (02/1992-07/1996)
- Banco Pactual S.A.
 - Trader (07/1989 – 01/1992)

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Ronaldo Lyrio is also associated with AGC's affiliates Genesis Investment Advisors ("GIA") and Genesis Fund Management ("GFM") as a Director.

Item 5- Additional Compensation

None

Item 6 - Supervision

Ultimately, the Chief Executive Officer is responsible for complete oversight of Genesis' activity. Through delegation to the Chief Compliance Officer ("CCO"), the CCO reviews all trades and enforces adherence to applicable laws, regulations and firm policies regarding discharge of the supervised person's duties. The use of a portfolio management system is employed as part of a surveillance program. Suspected violations are referred to the proper channels within the firm for further investigation and, if necessary, disciplinary action.

Rodrigo Rego - Chief Executive Officer – 786 866 3700

Don Lee - Chief Compliance Officer – 786 866 3700

Item 7- Requirements for State-Registered Advisers

Item 1- Cover Page

Don Lee

Alpha Genesis Capital LLC
("AGC")

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April 8, 2015

This Brochure Supplement provides information about Don Lee that supplements the AGC Brochure. You should have received a copy of that Brochure. Please contact AGC, Chief Compliance Officer at 786 866 3700 if you did not receive AGC Brochure or if you have any questions about the contents of this supplement.

Additional information about AGC available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

- Born 1972

Education

- B.A. Florida International University (1998 – 2001)
- M.B.A. Nova Southeastern University (2004 – 2005)

Business Background

- Genesis Investment Advisors LLC
 - Chief Compliance Officer (01/2015 – Present)
- Genesis Fund Management LLC
 - Chief Compliance Officer (01/2015 – Present)
- Global Strategic Investments, LLC
 - Chief Compliance Officer/ AMLCO (01/2011 – 12/2014)
- WallStreet*E Financial Services
 - Compliance & Operations Manager. (01/2001 – 09/2010)

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Don Lee is the Chief Compliance Officer of AGC's affiliate entities Genesis Investment Advisors ("GIA") and Genesis Fund Management ("GFM"). Don also owns a software development company that has produced an automated compliance solution for the financial services industry. This outside business activity is conducted outside of working hours at AGC.

Item 5- Additional Compensation

None

Item 6 - Supervision

Ultimately, the Chief Executive Officer is responsible for complete oversight of AGC activity. Through delegation to the Chief Compliance Officer ("CCO"), the CCO reviews all trades and enforces adherence to applicable laws, regulations and firm policies regarding discharge of the supervised person's duties. The use of a portfolio management system is employed as part of a surveillance program. Suspected violations are referred to the proper channels within the firm for further investigation and, if necessary, disciplinary action.

Rodrigo Rego - Chief Executive Officer – 786 866 3700

Don Lee - Chief Compliance Officer – 786 866 3700

Item 7- Requirements for State-Registered Advisers

Not applicable.