

Part 2A of Form ADV: *Firm Brochure*

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This brochure provides information about the qualifications and business practices of BigSur Wealth Management, LLC (hereinafter “BSWM” or “firm” or “we”). If you have any questions about the contents of this brochure, please contact us at (305) 740-6777 or at info@bigsurpartners.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about BSWM is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for BSWM is 146511. Registration with the Securities and Exchange Commission does not imply any level of skill or training.

Item 1. Summary of Material Changes

No material changes since last filing.

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Item 4. Advisory Business

BSWM is a fee-based SEC-registered investment adviser with its principal place of business located in Miami, Florida. We have been in business since end of 2007, with BigSur Partners, LLC (hereinafter, “BSP”) as the sole direct owner and with Ignacio Gabriel Pakciarz and Rafael Maria Iribarren as indirect owners and Managers of the firm.

The total assets under management and advisement is \$883,994,664 as of December 31, 2016, with the following breakdown:

<u>Advisory Service</u>	<u>Approximate Amount (\$):</u>
Discretionary	\$328,901,704
Non-discretionary	\$355,031,945
Consulting	\$200,061,015

Our firm offers the following advisory services to our clients:

Portfolio Management and Portfolio Consulting Services

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy statement (“IPS”) and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

We will manage advisory accounts on a discretionary or non-discretionary basis, as agreed with each client. We also provide portfolio consulting services where the client will retain the ultimate responsibility for the implementation of any or all of our recommendations. Portfolio consulting assets are not counted as our firm's assets under management. Account supervision is guided by the stated objectives of the client (such as conservative, moderate, growth), as well as other considerations, such as taxes. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Based on the overall management style selected by the client, we will typically allocate the client's assets among one or more third-party investment advisers, and other private funds, mutual funds, individual securities such as exchange traded funds, bonds, stocks and other investment products. Portfolio weighting among third-party investment advisers, other investments and market sectors will be determined by each client's individual needs and circumstances.

Use of Third-Party Managers

As part of this service, we perform professional management searches of unaffiliated investment advisers and determine which adviser(s) management style is appropriate to each of the asset categories in the client's targeted asset allocation. Factors we consider in making this determination include account size, risk tolerance, the opinion of each client and the investment philosophy and particular

niche of the selected investment adviser(s). Clients should refer to the selected investment adviser(s) disclosure document(s) for a full description of the services offered. Once we determine which selected investment adviser(s) are most appropriate for the client, we will, as necessary, provide the selected investment adviser(s) with the client's IPS. Each selected investment adviser will then create and directly manage an account with the portion of the clients' assets allocated to them while our firm monitors their performance.

Under our discretionary portfolio management services, if we determine at any point that a particular selected investment adviser is not providing satisfactory management services to the client, or is not managing the client's portfolio in a manner consistent with the client's IPS, we will remove the client's assets from that adviser and place the client's assets in another investment at our discretion. As such, our firm requests that the client grant the firm the authority to hire and fire the selected investment advisers on the client's behalf and to move funds among them, as appropriate.

Under our non-discretionary portfolio management services, if we determine at any point that a particular selected investment adviser is not providing satisfactory management services to the client, or is not managing the client's portfolio in a manner consistent with the client's IPS, we will recommend that the client contract with a different adviser. If such recommendation is accepted by the client, we will be responsible for arranging the removal of the client's assets, and the placing of the assets in another investment.

Under our portfolio consulting services, if we believe that a particular independent adviser is performing inadequately, or if we believe that a different manager is more suitable for a client's particular needs, then we will suggest that the client contract with a different adviser. Under this scenario, our firm will assist the client in selecting a new adviser, and then monitor that adviser's performance. However, any move to a new manager is solely at the discretion of the client.

Our firm will conduct or review appropriate due diligence prepared by third parties on all independent advisers, making reasonable inquiries into their portfolio management and compliance practices.

Use of Individual instruments

Our investment recommendations are not limited to any specific product or service offered by a broker dealer or insurance company or other investment firm and will primarily include advice regarding the following instruments:

- Equity securities
- Corporate debt securities and United States government securities
- Municipal securities
- Foreign issuer securities
- No-load or load-waived mutual funds
- Exchange-traded funds (ETFs)
- Investment in private placement offerings and/or limited investment partnerships

Occasionally, client portfolio holdings may also include the following instruments:

- Option contracts on securities
- Direct real estate investments through specially created private placement vehicles

We tailor all of our investment recommendations to the individual needs of each client. All consulting recommendations are based on information gathered through telephone, electronic and in-person discussions.

Private Placement Management Services

BSWM is offering pool investment purpose vehicles to facilitate clients' access to direct investments transactions, such as loans, Real Estate, equity, and others.

Interests in these pooled investment vehicles are offered in reliance upon various exemptions available under the securities laws for transactions in securities not involving a public offering. The structures are usually un-regulated closed-end investment funds and all investors are non-US persons. BSWM manages those investment vehicles on a discretionary basis in accordance with the terms and conditions of the Private Placement Memoranda and/or organizational documents.

Prospective investors in the pooled investment vehicles should be aware of additional risks, restrictions on withdrawals and redemptions and other important information associated with the pooled investment vehicles. This information is outlined in the private placement memoranda and subscription documents, and prospective investors should refer to these documents for information regarding these important additional considerations and risk.

Item 5. Fees and Compensation

Portfolio Management/Portfolio Consulting Services

We use the same fee structure for Portfolio Management Services and Portfolio Consulting services. Our fee schedule below is based on a percentage of assets under management or consultation, as appropriate (hereinafter the Management/Consultation Fee), and may include an additional annual incentive fee (hereinafter the "Incentive Fee").

- Management/Consultation Fee

We will charge the Management/Consultation Fee as a percentage of assets under management or consultation, typically ranging from 0.50% to 1.50%, based on the complexity of the client's individual portfolio and the size of the client's portfolio. We will quote an exact percentage to each client based on both the complexity and total dollar value of that account.

- Incentive/Performance Fee

At the end of each calendar year, for those clients subject to an incentive/performance fee, our firm will be entitled to an incentive fee of up to 20% of a client's account performance above a threshold specified in the executed investment advisory agreement and calculated in accordance with the formula specified in the executed investment advisory agreement.

Clients who elect to terminate their contracts will be charged an incentive fee based on the performance of the account for the measuring period going back from the termination date and pro-rated from the date on which the incentive fee was last assessed.

- Fees in General

Typically, we will directly invoice clients for our Management/Consultation fees in arrears or in advance (as agreed with each client). At times, we may directly debit client fees from their custodial account(s), if so desired by the client.

Fees and account minimums for all services are negotiable based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the account, etc.). Discounts, not generally available to our advisory clients, may be offered to family members of our staff.

We may group certain related client accounts for the purposes of determining the account size and/or annualized fee.

- Account Termination

Clients will have a period of five (5) business days from the date of signing the agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, the client may terminate the agreement by providing us with a written notice ranging from 5 to 30 days, depending on the terms of each advisory agreement, at our principal place of business. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Clients understand that they could make most of these investments directly, without the services of our firm. In that case, the client would not receive the services provided by us which are designed, among other things, to assist the client in determining which products are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees by others, and the fees charged by us to fully understand the total amount of fees to be paid and to thereby evaluate the advisory services being provided.

- Mutual Fund and ETF Fees and Expenses

All fees paid to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee.

- Brokerage and Custodian Fees

In addition to advisory fees paid to our firm, clients will also be responsible for all transaction, brokerage, and custodian fees incurred as part of their account management. Please see Item 12 of this Brochure for important disclosures regarding our brokerage practices.

- Third-Party Manager Fees

Our fee is in addition to the fees charged by selected third party investment advisers for the portion of the client's account under each adviser's direct management. Clients should refer to the selected registered investment adviser's disclosure document (Part 2 of Form ADV or other disclosure document in lieu of Part 2) for information regarding the advisory fees charged.

Private Placement Fees

We as investment manager of these vehicles will typically charge a fee as a percentage of invested capital, typically ranging from 0.50% to 1.50%, depending on considerations such as transaction's complexity, work, expected return, third party costs, etc. We also may be entitled to carried interest ranging from 0 to 20% specified and calculated in accordance with the formula in the Private Offering Memorandum.

If BSWM's advisory client invest in these pools and we are charging "Private Placement" fees, there will be a waiver of the "Portfolio Management Services and Portfolio Consulting Services" fees in order to avoid double layer of fees.

Prospective investors in the pooled investment vehicles should be aware of additional risks, restrictions on withdrawals and redemptions and other important information associated with the pooled investment vehicles. This information is outlined in the private placement memoranda and subscription documents, and prospective investors should refer to these documents for information regarding these important additional considerations and risk.

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

As we disclosed in Item 5 of this Brochure, our firm accepts a performance-based fee from certain clients. Such a performance-based fee is calculated based on the IRR of the account calculated by BSWM's reporting system. Prior to September 19, 2011, to qualify for a performance-based fee arrangement, a client had to either demonstrate a net worth of at least \$1,500,000 or have had at least \$750,000 under management immediately after entering into a management agreement with us. Clients entering into a management agreement with us after September 19, 2011, must either demonstrate a net worth of at least \$2,000,000 (excluding the value of their primary residence) or have \$1,000,000 under management with us in order to qualify for a performance-based fee arrangement.

Clients should be aware that performance-based fee arrangement may create an incentive for us to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Furthermore, since we also have clients who do not pay performance-based fees, we have an incentive to favor accounts that do pay such fees because compensation we receive from these clients is more directly tied to the performance of their accounts. Since we endeavor at all times to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser, we take the following steps to address these conflicts:

1. We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and its employees to earn more compensation from advisory clients who pay performance-based fees;
2. We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
3. Our management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
4. We have implemented policies and procedures for fair and consistent allocation of investment opportunities among all client account;

5. We periodically compare holdings and performance of all accounts with similar strategies to identify significant performance disparities indicative of possible favorable treatment; and
6. We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients and equitable treatment of all clients, regardless of the fee arrangement.

Performance-based fees will only be charged in accordance with the provisions of Rule 205-3 of the Investment Advisers Act of 1940 and/or applicable state regulations. The fees will not be offered to any client residing in a state in which such fees are prohibited.

The client must understand the performance-based fee method of compensation and its risks prior to entering into a management contract with us.

Item 7. Types of Clients

Our firm primarily provides advisory services to foreign entities, trusts and high net worth individuals. We also provide advisory services to U.S. high net worth individuals, trusts, estates, and business entities.

Although we do not require a minimum relationship size, we recommend a relationship with at least \$20,000,000 of assets under management or advisement.

Minimum subscriptions per investors in private placement is US \$200,000 subject to lower amounts as the Director may in discretion accept.

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

Our firm employs the following types of analysis to formulate client recommendations:

Fundamental analysis. Primarily, utilizing third-party research, 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 underpriced (indication 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.

Technical analysis: Sometimes, we analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and to 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.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest successfully over a period of time and in different economic conditions. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

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

Third-Party Manager Analysis: We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, it is possible for us to miss the absence of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Risks for all forms of analysis: Our securities analysis method relies on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Our firm employs the following investment strategies to implement investment advice given to clients:

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

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

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

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

Trading: At times, we purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of our predictions of brief price swings.

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

Short sales: Rarely, we borrow shares of a stock for your portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. We then sell the shares we have borrowed. On the agreed-upon future date, we buy the same stock and return the shares to the original owner. We engage in short selling on based on our determination that the stock will go down in price after we have borrowed the shares. If the stock has gone down since we purchased the shares from the original owner, we keep the difference.

One risk in selling short is that losses are theoretically unlimited; we are obligated to repurchase the stock no matter how much the price has climbed. In addition, even if we are correct in determining that the price of a stock will decline, we run the risk of incorrectly determining when the decline will take place.

Margin transactions: We may purchase securities for a client portfolio with money borrowed from a client's brokerage account. This allows a client to purchase more securities than he/she would be able to with his/her available cash, and allows us to purchase securities without selling other holdings.

A risk in margin trading is that, in volatile markets, securities prices can fall very quickly. If the value of the securities in your account minus what a client owes the broker falls below a certain level, the broker will issue a "margin call", and a client will be required to sell his/her position in the security purchased on margin or add more cash to the account. In some circumstances, a client may lose more money than he/she originally invested.

Option writing: We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

A call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock will increase substantially before the option expires.

A put gives us the holder the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock will fall before the option expires or we will sell a put if we have determined that the price of the stock will increase before the option expires.

We may use options to "hedge" a purchase of the underlying security; in other words, we may use an option purchase to limit the potential upside and downside of a security we have purchased for your portfolio. We may also use options to speculate on the possibility of a sharp price swing.

There are a number of strategies but mostly use "covered calls", in which we sell an option on security you own. In this strategy, you receive a premium for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price.

A risk of covered calls is that the option buyer does not have to exercise the option, so that if we want to sell the stock prior to the end of the option agreement, we have to buy the option back from the option buyer, for a possible loss.

Private Placement Risks

The below Private Placement Risks are only applicable to Fund investors.

Principal Investment Risks: Prospective private placement investors should consider the all risk factors and special considerations associated with investing, which may cause some or all investors to lose money. An investment carries substantial risk. There can be no assurance that the investment objective and strategy will be achieved and investment results may vary substantially over time. An investment is only suitable for investors who are able to bear the loss of a substantial portion or even all of their investment. There is generally no public market for the Shares, nor is a public market expected to develop in the future.

Liquidity Risk: Liquidity risk exists when particular investments are difficult to purchase or sell. Securities may become illiquid under adverse market or economic conditions and/or due to specific adverse changes in the condition of a particular issuer. If investments are made in illiquid securities or securities become illiquid, returns may be reduced because of the inability to sell the illiquid securities at an advantageous time or price. The notes and shares should be considered illiquid.

No Assurance will meet Investment Objectives: There can be no assurance that the private placements will achieve its investment objectives (including any stated yield or return or investment targets or projections), be able to exit the investments during the term, or that investors will not suffer losses. Return, cash flow, geographic, property type and other targets and projections are based upon assumptions made by the investment manager which may differ in material respects from actual outcomes.

Risk of Reliance on Originators: With respect to the private placements the investment manager will generally be reliant on the information and disclosures furnished to it by the originator, which may subject to fraudulent misrepresentation and other similar risks of entrusting capital to unaffiliated third parties. The investment manager seeks to avoid such risks by enforcing prudent due diligence and third-party verification wherever possible but may prove unable to obtain accurate information from the originator under circumstances in which the originator has limited access to such information or provides inaccurate information. The due diligence investigation that the originator carries out with respect to any investment opportunity may not reveal or highlight all relevant facts that may be necessary or helpful in evaluating such investment opportunity. Moreover, such investigation will not necessarily result in the investment being successful.

Concentration Risk: The private placement will typically participate in one or few securities of one company. Therefore, the returns could be impaired by such concentration if the obligor's particular sector, industry or geographic location were to experience adverse business conditions or other adverse events.

Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.

Item 9. Disciplinary Information

Our firm has no reportable disciplinary events to disclose.

Item 10. Other Financial Industry Activities and Affiliations

As stated before, our firm is wholly owned by BSP, an entity which operates and provides multifamily office services to target high net worth clients. These services can include the managing of non-securitized real estate holdings, the management of business entities, including closely-held businesses, the hiring of outside consultants, including bookkeepers and bookkeeping services, attorneys, private bankers, accountants, insurance advisors, real estate management firms, and ad hoc concierge services that are typically requested by family offices. Typically, BSP will charge clients separate and distinct fees for these non-advisory services, in addition to our advisory fees discussed in Item 5 of this Brochure. However, BSP may, at its sole discretion, reduce or waive some or all of these non-advisory fees. Our firm may recommend BSP's family-office services to our advisory clients, and BSP may recommend our advisory services to its family-office clients. However, no referral fees of any kind are exchanged between these two entities.

BSP is also the sole owner of BigSur Real Estate LLC (hereinafter, "BSRE). BSRE may serve a director or general partner to certain entities created to provide access and facilitate investments by BSWM clients into certain real estate opportunities. BSRE will not engage in the actual day-to-day management of the selected real property investments.

These non-advisory activities present a potential conflict of interest, to the extent that our principals and owners may receive additional compensation as a result of recommending family office or real estate investment services provided by BSP or BSRE to clients. Potential conflicts of interest also arise to the extent that these non-advisory activities may require a significant time commitment from our principals and employees, thus limiting the amount of time they can dedicate to management of advisory client accounts. Furthermore, BSWM, in terms of its real estate activities, and private placements may also be deemed to have constructive custody over assets of entities for which our related persons serve as directors or general partners.

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

1. We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and its employees to earn compensation from advisory clients in addition to our advisory fees;
2. We disclose to clients that they are not obligated to purchase any additional services from our firm or its employees;
3. We do not pay or collect referral fees from any related persons or entities;
4. We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;

5. Our management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
6. We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
7. We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm;
8. As an Adviser to a pooled investment vehicle, our firm is subject to an annual audit by an independent public accountant registered with, and subject to regular inspection by the PCAOB and distributes the audited financial statements to each investor in the pool within 120 days after the pool's fiscal year end;
9. Our firm has implemented internal policies and procedures to monitor and safeguard client funds; and
10. We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

BSWM, as the investment manager to pooled investment vehicles, may have economic interests in or other relationships with obligors or issuers in whose securities the pooled investment vehicles may invest. Such related persons may make and/or hold investments in these securities and partners, security holders, members, managers, officers, directors, agents or employees of such persons may serve on boards of directors, boards of managers or boards of members or otherwise have ongoing relationships.

BSP, as Director to the pooled investment vehicle, supervises the conduct of the vehicle's affairs. BSP has delegated the investment management activities, the authority to make all investment decisions, and otherwise management of the business affairs to BSWM as the investment manager. BSP, as Director, may have a conflict of interest between its fiduciary duty of the investment vehicle, and its selection of one of its affiliates as the investment manager. Prospective investors must recognize that the vehicle has been formed specifically to access a concentrated exposure managed by the investment manager. BSP may not be inclined to appoint any other investment manager.

Item 11. Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Disclosure

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code provides for oversight, enforcement and recordkeeping provisions. A copy of our Code of Ethics is available to our advisory clients and prospective clients upon request to our Chief Compliance Officer at the firm's principal office address.

Our firm or individuals associated with our firm may buy or sell securities identical to those recommended to or purchased for customers for their personal accounts. In addition, any related

person(s) may have an interest or position in a certain security or certain securities which may also be recommended to a client. This practice results in a potential conflict of interest, as we may have an incentive to manipulate the timing of such purchases to obtain a better price or more favorable allocation in rare cases of limited availability.

We may aggregate our employee trades with client trades. In case there is a partial fill of a particular batch order, we will allocate all the purchases pro-rata, with each account paying average price.

To mitigate these potential conflicts of interest and ensure the fulfillment of our fiduciary responsibilities, we have established the following restrictions:

1. No persons associated with our firm may buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No persons associated with our firm may prefer his or her own interest to that of the advisory client.
2. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.
3. We maintain a list of all securities holdings for our firm and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by executive management and/or members of the research or compliance staff.
4. We emphasize the unrestricted right of the client to decline to implement any advice rendered, except in situations where our firm is granted discretionary authority.
5. All persons associated with our firm must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
6. Any individual not in observance of the above may be subject to disciplinary action or termination.

Item 12. Brokerage Practices

We do not have any formal or informal soft-dollar arrangements and do not receive any soft-dollar benefits.

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

For clients in need of brokerage or custodial services, and depending on client circumstances and needs, we will recommend the use of one of several broker dealers, provided that such recommendation is consistent with our fiduciary duty to the client. Our clients must evaluate these brokers before opening an account. The factors considered by our firm when making this recommendation are the broker's ability to provide professional services, our experience with the broker, the broker's reputation, and the broker's quality of execution services and costs of such services, and the custodial platform provided to clients, among other factors.

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

Our firm may have limited brokerage discretion on some client accounts where the client has pre-existing relationships with multiple broker dealers for the same account. In such cases, we will have the discretion to select a broker dealer from the pool of broker dealers approved and selected by the client. All broker dealers so selected and approved by the client must be indicated in writing on Schedule A of the advisory agreement. We will typically also have full brokerage discretion over accounts custodied with Pershing, LLC and/or Pershing Advisor Solutions, LLC. In cases where our firm has such limited brokerage discretion or full brokerage discretion, we will endeavor to select those brokers or dealers which will provide the best services at the lowest commission rates possible. The reasonableness of commissions is based on the broker's ability to provide professional services, competitive commission rates, research and other services which will help us in providing investment management services to clients. We may, therefore recommend (or use) the use of a broker who provides useful research and securities transaction services even though a lower commission may be charged by a broker who offers no research services and minimal securities transaction assistance. Research services may be useful in servicing all our clients, and not all of such research may be useful for the account for which the particular transaction was effected.

With respect to the use of third party investment advisers, each such adviser may or may not recommend broker dealers to clients, and/or will have their own policies, practices and procedures regarding brokerage. Our firm does not directly recommend the services of any particular broker dealer to these clients under these circumstances. Clients should refer to the disclosure document(s) of recommended independent registered investment adviser(s) for information on the brokerage recommendations, practices and policies for those entities.

Trade Aggregation

We may aggregate client trades when doing so is advantageous to our clients. Mostly, we will batch client transactions to receive volume discounts and to obtain better and more uniform pricing across client accounts. If we determine that aggregation of trades in a certain situation will be beneficial to our clients, transactions will be averaged as to price and will be allocated among our clients in proportion to the purchase and sale orders placed from each client account on any given day. Any exceptions from the pro-rata allocation procedure will be carefully explained and documented. Such exceptions may occur due to varying cash availability across accounts, divergent investment objectives and existing concentrations, and desire to avoid "odd lots," (an amount of a security that is less than the normal unit of trading for that particular security).

Individual investment accounts are managed by different portfolio managers which may or may not always share information or discuss investment and trade strategies. For this reason, different portfolio managers of our firm may not aggregate (block) trades across different accounts. Because not all trades are aggregated, some clients may receive better prices or be beneficiaries of increased availability. Furthermore, it is possible that certain securities will be bought or sold by a portfolio manager for his/her client accounts without a similar transaction being contemplated for accounts managed by other portfolio managers, even if such a transaction could be suitable for these accounts. We will

attempt to minimize such instances through frequent Investment Committee discussions and firm-wide broadcasts of limited opportunity investments, whenever feasible and practicable.

Trade aggregation and participation in certain investment opportunities may be limited to the client's selection of custodian and/or broker.

Item 13. Review of Accounts

Portfolio Management/Portfolio Consulting

Our Investment Committee and/or Compliance Department will continuously monitor the underlying securities in client accounts and perform at least annual reviews of account holdings for all clients. We will also monitor the performance of third-party managers on a continuous basis. Accounts are reviewed for consistency with client investment strategy, asset allocation, risk tolerance and performance relative to the appropriate benchmark. More frequent reviews may be triggered by changes in an account holder's personal, tax or financial status. Geopolitical and macroeconomic specific events may also trigger reviews.

In addition to the monthly statements and confirmations of transactions that clients receive from their broker dealer, our firm will typically provide monthly consolidated account summaries and/or performance reports, as contracted for at the inception of the advisory relationship. Clients should refer to the selected registered investment adviser(s) disclosure document(s) for information regarding the nature and frequency of additional reports, if any, provided by the selected third party investment advisers.

Private Placement Management

Private Placement shareholders shall receive annual audited financial statements related to the Fund, as soon as practicable after the end of each fiscal year and no later than 120 days after the end of each fiscal year. Additionally, shareholders shall receive unaudited statements on an annual basis, and, if needed, annual information for completion of federal income taxes.

We typically appoint a Third Party Administrator to perform all general administrative tasks for the Pools, including keeping financial records, calculation of the net asset value including calculating investor distributions in accordance with the waterfall provisions of the investment vehicle, maintaining the shareholder register, and handling capital calls and distributions.

Item 14. Client Referrals and Other Compensation

Our firm and/or its principal executive officers may, from time to time, receive incentive awards for the recommendation/introduction of certain investment products, such as other private investment funds. The receipt of this compensation may affect our judgment in recommending investments to its clients. We generally offset a client's advisory fee by the amount of the received incentive award.

We may pay referral fees to our employees for referring advisory clients to our firm. If a client is introduced to us by either an affiliated or unaffiliated solicitor, we may pay that solicitor an ongoing referral fee typically ranging from 5% to 25% of the referred client's advisory fee paid to our firm.

Payment of referral fees for prospective client referrals creates a potential conflict of interest to the extent that such a referral is not unbiased and the solicitor is, at least partially, motivated by financial

gain. Therefore, such a referral may be made even if our advisory services are not suitable to a particular client's needs or entering into an advisory relationship with us is not, overall, in the best interest of the client. As these situations represent a conflict of interest, we have established the following restrictions in order to ensure our fiduciary responsibilities:

1. All such referral fees are paid in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements;
2. Any such referral fee will be paid solely from our investment management fee, and will not result in any additional charge to the client;
3. If the client is introduced to us by an unaffiliated solicitor, the solicitor, at the time of the solicitation, will disclose the nature of his/her/its solicitor relationship and provide each prospective client with a copy of our Form ADV Part 2 Brochure, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between our firm and the solicitor, including the compensation to be received by the solicitor from us; and
4. All referred clients will be carefully screened to ensure that our fees, services, and investment strategies are suitable to their investment needs and objectives.

Item 15. Custody

Custody is defined as any legal or actual ability by our firm to access client funds or securities. Since all client funds and securities are maintained with a qualified custodian, we don't take physical possession of client assets. However, because for some clients whose assets are custodied with Pershing, we may directly debit fees from their custodial accounts, our firm is deemed to have constructive custody of client funds. As stated in Item 10 of this Brochure, our firm may also be deemed, in terms of its role as Investment Manager, to have constructive custody over assets of fund investors. Furthermore, due to its real estate activities, the firm is deemed to have custody over the assets of entities for which our related persons serve as directors or general partners.

We urge all of our management clients to carefully review and compare their reviews of account holdings and/or performance results received from us to those they receive from their custodian. Should you notice any discrepancies, please notify us and/or your custodian as soon as possible.

Since under current applicable regulatory interpretations we may be deemed to have constructive custody over assets of pooled entities for which our related persons serve as directors or general partners, we seek to have each of the pooled entities audited on an annual basis by an independent public accountant that is both registered with and subject to regular inspection by the Public Company Accounting Oversight Board (PCAOB). We seek to send, directly or through a third party, the audited financials to each pooled entity investor within 120 days of the applicable pooled entity's fiscal year end.

Item 16. Investment Discretion

For clients granting us discretionary authority to determine which securities and the amounts of securities that are to be bought or sold for their account(s), we request that such authority be granted in writing, typically in the executed investment management agreement and/or relevant fund organizational documents. With respect to the use of third party investment advisers, our firm does not manage these client portfolios, or this portion of these client portfolios, in the traditional sense of

the definition, rather, we manage the managers. As such, the client may grant us the authority to hire and fire the selected registered investment adviser(s) directly.

Should the client wish to impose reasonable limitations on this discretionary authority, such limitations shall be included in the executed investment advisory agreement. Clients may change/amend these limitations as desired. Such amendments must be submitted to us by the client in writing.

Item 17. Voting Client Securities

As a matter of firm policy, our firm does not vote proxies on behalf of clients. Clients will receive their proxies and other solicitations directly from their custodian or transfer agent and retain sole responsibility for voting. However, we may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

Item 18. Financial Information

Under no circumstances will we earn fees in excess of \$1,200 more than six months in advance of services rendered.

Part 2B of Form ADV: *Brochure Supplement*

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3/29/2017

This brochure supplement provides information about Ignacio Pakciarz that supplements the BigSur Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Ignacio Gabriel Pakciarz, Investment Adviser Representative

Founding Partner
President and CEO

Year of Birth: 1968

Education:

Mr. Pakciarz graduated from the University of Uruguay with a degree in Economics in 1992 and from the New York University with an MBA in Finance in 1996.

Business Background:

Manager, BigSur Wealth Management, LLC from 11/2007 to present
Partner, BigSur Partners from 11/2007 to present
Engaged in the formation of BigSur Wealth Management, LLC, 10/2007
Managing Director, Guggenheim Investment Advisors from 03/2004 to 12/2007
Managing Director, Deutsche Bank from 04/2001 to 12/2003

Industry Examinations:

NASAA Series 65, Uniform Investment Advisor Law Examination, 2004
NASAA Series 63, Uniform Securities Agent State Law Examination, 1997

Item 3. Disciplinary Information

Mr. Pakciarz does not have any history of reportable disciplinary events.

Item 4. Other Business Activities

Mr. Pakciarz is a Partner in BigSur Partner, LLC (hereinafter, "BSP"), an entity which owns BSWM and provides multifamily office services to target high net worth clients. Please see Item 10 of our Form ADV Part 2 for additional details regarding the services provided by this related firm.

Some of these non-advisory activities present a potential conflict of interest, to the extent that Mr. Pakciarz may receive additional compensation as a result of recommending the services of BSP to our clients. Potential conflicts of interest also arise to the extent that these non-advisory activities may require a certain time commitment from Mr. Pakciarz, thus limiting the amount of time he can dedicate to management of advisory client accounts. Please refer to Item 10 of this Brochure for a detailed explanation of how our firm addresses these conflicts of interest.

Item 5. Additional Compensation

Mr. Pakciarz does not receive any additional compensation from third parties for providing investment advice to our clients.

Item 6. Supervision

As indirect owners of BSWM, Ignacio Pakciarz and Rafael Iribarren determine the general business strategy of the firm and are jointly responsible for all employee supervision. They can be reached at (305) 740-6777. Mr. Pakciarz and Mr. Iribarren also supervise our firm's Investment Committee which is responsible for formulation and monitoring of investment advice offered to client, documenting investment meeting deliberations, overseeing all material investment policy changes, and conducting periodic testing to ensure that client objectives and mandates are being met.

Part 2B of Form ADV: *Brochure Supplement*

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3/29/2017

This brochure supplement provides information about Rafael Iribarren that supplements the BigSur Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Rafael Maria Iribarren, Investment Adviser Representative

Founding Partner

Chief Financial Officer Head of Real Estate Advisory

Year of Birth: 1973

Education:

Mr. Iribarren graduated from the Universidad Catolica Argentina with a degree in Economics in 1991.

Business Background:

Manager, BigSur Wealth Management, LLC from 11/2007 to present

Partner, BigSur Partners from 11/2007 to present

Engaged in the formation of BigSur Wealth Management, LLC, 10/2007

Director, Deutsche Bank Trust Company Americas from 07/2003 to 09/2007

Registered Representative, Deutsche Bank Securities, Inc. from 06/2001 to 07/2003

Industry Examinations:

NASAA Series 65, Uniform Investment Advisor Law Examination, 2000

NASAA Series 63, Uniform Securities Agent State Law Examination, 2000

Professional Designations:

Mr. Iribarren earned the Chartered Financial Analyst (CFA) designation in 2004. The CFA designation is an international professional certification offered by the CFA Institute (formerly AIMR) to financial analysts who complete a series of three examinations. To become a CFA charterholder candidates must pass each of three six-hour exams, possess a bachelor's degree (or equivalent, as assessed by CFA institute) and have 48 months of qualified, professional work experience. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3. Disciplinary Information

Mr. Iribarren does not have any history of reportable disciplinary events.

Item 4. Other Business Activities

Mr. Iribarren is a Partner in BigSur Partner, LLC (hereinafter, "BSP"), an entity which owns BSWM and provides multifamily office services to target high net worth clients. Please see Item 10 of our Form ADV Part 2 for additional details regarding the services provided by this related firm.

Some of these non-advisory activities present a potential conflict of interest, to the extent that Mr. Iribarren may receive additional compensation as a result of recommending the services of BSP to our clients. Potential conflicts of interest also arise to the extent that these non-advisory activities may require a certain time commitment from Mr. Iribarren, thus limiting the amount of time he can dedicate to management of advisory client accounts. Please refer to Item 10 of this Brochure for a detailed explanation of how our firm addresses these conflicts of interest.

Item 5. Additional Compensation

Mr. Iribarren does not receive any additional compensation from third parties for providing investment advice to our clients.

Item 6. Supervision

As indirect owners of BSWM, Ignacio Pakciarz and Rafael Iribarren determine the general business strategy of the firm and are jointly responsible for all employee supervision. They can be reached at (305) 740-6777. Mr. Pakciarz and Mr. Iribarren also supervise our firm's Investment Committee which is responsible for formulation and monitoring of investment advice offered to client, documenting investment meeting deliberations, overseeing all material investment policy changes, and conducting periodic testing to ensure that client objectives and mandates are being met.

Part 2B of Form ADV: *Brochure Supplement*

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3/29/2017

This brochure supplement provides information about Gerhard Herrera-Pahl that supplements the BigSur Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Gerhard Herrera-Pahl, Investment Adviser Representative

Head of Investment

Year of Birth: 1970

Education:

Mr. Herrera-Pahl graduated from Instituto Tecnológico Autónomo de México in 1993 with a BSC degree in Economics and Science and in 1996 completed course work for an MSC degree in Finance.

Business Background:

Investment Adviser Representative, BigSur Wealth Management, LLC from 11/2012 to present. Managing Director, Chief Investment Officer, Guggenheim Partners Latin America, Inc. from 03/2010 to 08/2012.

Managing Director, Chief Investment Officer, Guggenheim Investment Advisors LLC from 03/2003 to 08/2010.

Strategist, IDEA GLOBAL from 08/2001 to 01/2003

Industry Examinations:

Series 66, Uniform Combined State Law Examination, 2004

Item 3. Disciplinary Information

Mr. Herrera-Pahl does not have any history of reportable disciplinary events.

Item 4. Other Business Activities

Mr. Herrera-Pahl is not engaged in any outside business activities.

Item 5. Additional Compensation

Mr. Herrera-Pahl's compensation is partially contingent on the number of clients and/or amount of assets under management he solicits and secures on behalf of BWI.

Item 6. Supervision

As indirect owners of BSWI, Ignacio Pakciarz and Rafael Iribarren determine the general business strategy of the firm and are jointly responsible for all employee supervision. They can be reached at (305) 740-6777. Mr. Pakciarz and Mr. Iribarren also supervise our firm's Investment Committee which is responsible for formulation and monitoring of investment advice offered to client, documenting investment meeting deliberations, overseeing all material investment policy changes, and conducting periodic testing to ensure that client objectives and mandates are being met.

Part 2B of Form ADV: *Brochure Supplement*

Cecilia Brandileone
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3/29/2017

This brochure supplement provides information about Cecilia Brandileone that supplements the BigSur Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Cecilia Brandileone, Advisor

Year of Birth: 1973

Education:

Ms. Brandileone graduated from Florida International University in 1997 with a Bachelor's degree in Marketing and Management and a minor in International Finance. She also completed coursework in business administration at the Pontificia Universidade Catolica in Sao Paulo, Brazil and in marketing at Fundacao Armando Pentead in Sao Paulo, Brazil.

Business Background:

Advisor, BigSur Wealth Management, LLC from 02/2015 to present
Relationship Manager, Royal Bank of Canada, Miami from 2004 to 01/2015
Relationship Manager, BankBoston International, Miami from 2001 to 2004
Private Banking Assistant, BankBoston International, Miami from 1998 to 2001
Accounting Assistant, TAM Parts and Logistics, Miami from 1996 to 1998

Industry Examinations:

None.

Item 3. Disciplinary Information

Ms. Brandileone does not have any history of reportable disciplinary events.

Item 4. Other Business Activities

Ms. Brandileone is not engaged in any outside business activities.

Item 5. Additional Compensation

Ms. Brandileone's compensation is contingent on the number of clients and/or amount of assets under management she solicits and secures on behalf of BSWM.

Item 6. Supervision

As indirect owners of BSWM, Ignacio Pakciarz and Rafael Iribarren determine the general business strategy of the firm and are jointly responsible for all employee supervision. They can be reached at (305) 740-6777. Mr. Pakciarz and Mr. Iribarren also supervise our firm's Investment Committee which is responsible for formulation and monitoring of investment advice offered to client, documenting investment meeting deliberations, overseeing all material investment policy changes, and conducting periodic testing to ensure that client objectives and mandates are being met.

Part 2B of Form ADV: *Brochure Supplement*

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3/29/2017

This brochure supplement provides information about Celia Konig that supplements the BigSur Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Celia Konig, Advisor

Year of Birth: 1957

Education:

Ms. Konig graduated from Baruch College, NY in 1997 with a Bachelor's degree in International Business Marketing. She also completed additional finance coursework at New York University from 1997-2011 and in French language and civilization at Universite de la Sorbonne, Paris from 1982-1983.

Business Background:

Advisor, BigSur Wealth Management, LLC from 02/2015 to present
Relationship Manager, Royal Bank of Canada, New York from 2000 to 01/2015
Private Banking Associate, Deutsche Bank, New York from 1996 to 2000

Industry Examinations:

None

Item 3. Disciplinary Information

Ms. Konig does not have any history of reportable disciplinary events.

Item 4. Other Business Activities

Ms. Konig is not engaged in any outside business activities.

Item 5. Additional Compensation

Ms. Konig's compensation is contingent on the number of clients and/or amount of assets under management she solicits and secures on behalf of BSWM.

Item 6. Supervision

As indirect owners of BSWM, Ignacio Pakciarz and Rafael Iribarren determine the general business strategy of the firm and are jointly responsible for all employee supervision. They can be reached at (305) 740-6777. Mr. Pakciarz and Mr. Iribarren also supervise our firm's Investment Committee which is responsible for formulation and monitoring of investment advice offered to client, documenting investment meeting deliberations, overseeing all material investment policy changes, and conducting periodic testing to ensure that client objectives and mandates are being met.

Part 2B of Form ADV: *Brochure Supplement*

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3/29/2017

This brochure supplement provides information about Carlos Hernandez Artigas that supplements the BigSur Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Carlos Hernandez Artigas, Advisor

Year of Birth: 1963

Education:

Mr. Hernandez-Artigas graduated from Universidad Panamericana, Escuela de Derecho (“JD” equivalent in 1987) and University of Texas at Austin, School of Law (“MCJ” in 1988). He received a Master of Business Administration from IPADE in Mexico City (1996).

Business Background:

Advisor, BigSur Wealth Management, LLC from 2016 to present.

Founding partner of Forrestal Capital.

General Counsel, and Chief Legal Officer and Secretary of the Board of Directors of Miami, Florida based Panamerican Beverages, Inc. (“Panamco”).

Item 3. Disciplinary Information

Mr. Hernandez does not have any history of reportable disciplinary events.

Item 4. Other Business Activities

Mr. Hernandez is not engaged in any outside business activities.

Item 5. Additional Compensation

Mr. Hernandez compensation is contingent on the number of clients and/or amount of assets under management she solicits and secures on behalf of BSWM.

Item 6. Supervision

As indirect owners of BSWM, Ignacio Pakciarz and Rafael Iribarren determine the general business strategy of the firm and are jointly responsible for all employee supervision. They can be reached at (305) 740-6777. Mr. Pakciarz and Mr. Iribarren also supervise our firm’s Investment Committee which is responsible for formulation and monitoring of investment advice offered to client, documenting investment meeting deliberations, overseeing all material investment policy changes, and conducting periodic testing to ensure that client objectives and mandates are being met.

Part 2B of Form ADV: *Brochure Supplement*

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3/29/2017

This brochure supplement provides information about John Roesset that supplements the BigSur Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

John Richard Roesset, Advisor

Year of Birth: 1963

Education:

Mr. Roesset has a Bachelor of Science in Electrical Engineering with Honors from the University of Texas, and is a member of the Sigma Tau Gamma fraternity. He holds a Master of Business Administration with Honors from the Amos Tuck School of Business Administration Dartmouth College.

Business Background:

Advisor, BigSur Wealth Management, LLC from 3/2017 to present
Director, Head of Fixed Income and Equity Flow Trading, Citi Private Bank (Citibank, N.A.) from 3/2006 to 7/2016
Founder of JRR Asset Management equity and options trading and asset management firm from 2/1998 to 3/2016.
ING Baring Securities, Inc., 9/1996 to 2/1998.
Citicorp Securities, Inc., 9/1993 to 9/1996.

Industry Examinations:

State Securities Law Exam

Series 66 - Uniform Combined State Law Examination, Oct 19, 2006

Series 63 - Uniform Securities Agent State Law Examination, Jan 13, 1994

General Industry/Products Exam

Series 3 - National Commodity Futures Examination, Sep 19, 2013

Series 7 - General Securities Representative Examination, Oct 12, 2006

Principal/Supervisory Exam

Series 9 - General Securities Sales Supervisor - Options Module Examination, Jul 15, 2010

Professional Designations:

Mr. Roesset earned the Chartered Financial Analyst (CFA) designation in. The CFA designation is an international professional certification offered by the CFA Institute (formerly AIMR) to financial analysts who complete a series of three examinations. To become a CFA charterholder candidates must pass each of three six-hour exams, possess a bachelor's degree (or equivalent, as assessed by CFA institute) and have 48 months of qualified, professional work experience. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3. Disciplinary Information

Mr. Roesset does not have any history of reportable disciplinary events.

Item 4. Other Business Activities

Mr. Roeset is not engaged in any outside business activities.

Item 5. Additional Compensation

Mr. Roeset compensation is contingent on the number of clients and/or amount of assets under management she solicits and secures on behalf of BSWM.

Item 6. Supervision

As indirect owners of BSWM, Ignacio Pakciarz and Rafael Iribarren determine the general business strategy of the firm and are jointly responsible for all employee supervision. They can be reached at (305) 740-6777. Mr. Pakciarz and Mr. Iribarren also supervise our firm's Investment Committee which is responsible for formulation and monitoring of investment advice offered to client, documenting investment meeting deliberations, overseeing all material investment policy changes, and conducting periodic testing to ensure that client objectives and mandates are being met.