

Item 1 – Cover Page

FlexAdvisor LLC

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**Form ADV Part 2A
December 2019**

This brochure provides information about the qualifications and business practices of FlexAdvisor LLC (“FlexAdvisor”, “us”, “we”, “our”). If you (“your”, “clients”) have any questions about the contents of this brochure, please contact us at (646) 508-7883 and/or rodrigo.garza@flexinvest.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Our CRD number is 298308.

We have applied for registration as investment adviser with the SEC. Our registration as an Investment Adviser will not imply any level of skill or training. Additional information will be available on the SEC’s website at www.adviserinfo.sec.gov (click on the link, select “Investment Adviser Search” and type in our firm name). The results will provide you with both Parts 1 and 2 of our Form ADV.

Item 2 – Material Changes

Please note that the changes and modifications to this Brochure that are set forth below reflect all of the “material changes” made to this brochure since our last delivery or posting of the Brochure on the SEC’s public disclosure website (IAPD) www.adviserinfo.sec.gov.

When an update is made to this Brochure, we will send you a copy that includes a summary of material changes, or we will send you a summary of material changes and offer to provide you a copy of the complete Brochure electronically or in paper form.

Summary of Material Changes:

Jhonny Paul Alcivar Romero CRD # 7017219 has replaced Catalina Rey as Chief Compliance Officer of the firm.

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Item 4 – Advisory Business

A. Description of the advisory firm

FlexAdvisor LLC (“FlexAdvisor”) is a limited liability company organized under the laws of the State of Delaware on May 18, 2018 and wholly owned by Jose Carlos Gonzalez CRD # 4346462. We have applied for registration as Investment Advisor with the SEC and will notice file with the appropriate states in which notice filings are required to provide the investment advisory services as described within this document.

At FlexAdvisor we will provide non-discretionary investment advisory services, which are offered to clients and prospective clients of the firm via web-based solutions and online informational resources. FlexAdvisor will provide all investment advisory services exclusively through virtual interaction conducted over the Internet. FlexAdvisor does not offer financial planning services, tax advice, or legal advice. This Disclosure Brochure provides clients with information regarding our qualifications, business practices, and advisory services.

Please contact our Chief Compliance Officer, if you have any questions about this Brochure.

B. Type of Advisory Services

FlexAdvisor will provide non-discretionary investment advice to clients solely through a technology platform developed and maintained by FlexInvest Securities, Inc. (“FlexInvest Securities”), an affiliate of FlexAdvisor, that is available through FlexInvest’s website and mobile application. FlexAdvisor does not provide investment advice in person, over the phone, in live chat, or in any other manner other than through the website and the mobile application. Each client is solely responsible for implementing such advice, rebalancing portfolios, allocating assets and in general, managing their own accounts.

FlexAdvisor’s clients will be required to sign an investment advisory agreement agreeing to the fees to be paid and all the conditions of the relationship with FlexAdvisor. The investment advisory agreement may be terminated by either party at any time by written notice. Termination of the agreement will not affect (a) the validity of any actions previously taken by us under the agreement; (b) liabilities or obligations of the parties from transactions initiated before termination of the agreement; or (c) clients obligation to pay the advisor fees.

FlexAdvisor’s clients will be encouraged, but not required, to open a brokerage account at FlexInvest Securities. FlexInvest Securities has an arrangement with Apex Clearing Corporation (“Apex”), a registered broker-dealer unaffiliated with FlexAdvisor through which clearing and custody services are provided to clients. Brokerage services will be provided through FlexInvest Securities accounts. Both Apex and FlexInvest Securities are

FINRA and SIPC members¹, and independent SEC registered broker-dealers.

Therefore, FlexAdvisor will provide non-discretionary investment advisory services to clients that wish to participate in the Wrap Fee Program by opening an account at FlexInvest Securities (**“Wrap Fee Participants”**), and to clients that use their existing brokerage account at an independent broker dealer unrelated to FlexAdvisor (**“Non-Wrap Fee Participants”**). Furthermore, Non-Wrap Fee Participants will be able to purchase FlexAdvisor’s Portfolios available in the platform and to implement our investment strategies using their own brokerage accounts.

C. Client Tailored Services and Client Impose Restrictions

FlexAdvisor via the website or the mobile application, will review the clients’ investment objectives, and based on each client’s risk tolerance, investment objectives, and time horizon will provide investment recommendations. Also, our website and mobile application will provide clients with automated educational guidance about investing and about investment portfolio management that will allow clients to build an strategy tailored to their investment needs.

As part of the registration process, each client inputs personal information, including age, financial resources, and investment objectives as responses to an interactive questionnaire. The website and the mobile application use an Algorithm to analyze such information and to provide investment recommendations and access to a list of suitable portfolios.

The following two groups of FlexAdvisor’s recommended Portfolios are available for purchase in the online platform:

- 1. FlexAdvisor’s Created Portfolios:** These are portfolios created by the FlexAdvisor’s professional team or portfolios in partnership with Moodys. Additional details regarding Methods of Analysis, Investment Strategies and Risk of Loss in Item 8 hereinbelow.
- 2. Institutional Partners Portfolios:** These are portfolios created by our institutional partners. FlexAdvisor has agreements with certain Registered Investment Advisors that utilize our platform to publish their owned balanced Portfolios and to make those Portfolios available to FlexAdvisor’s clients for purchase. FlexAdvisor conducts an extensive due diligence on the Institutional Partner before entering into an agreement with them. FlexAdvisor will also conduct periodic reviews of the partner’s Portfolios to ensure they meet FlexAdvisors investment guidelines.

The Algorithm relies on the answers provided in the questionnaire, and based on the input

¹ FlexAdvisor is not, nor required to be, a FINRA or SIPC member. Information about the Financial Industry Regulatory Authority (FINRA) may be found on its website, www.finra.org. You may learn more about the Securities Investor Protection Corporation (SIPC) and how it serves member firms and the investing public by visiting its website at www.sipc.org.

received from these answers the Algorithm generates a risk classification that coincides with the risk classification of the recommended portfolios. Consequently, clients are responsible for updating their information promptly should there be any changes in answers to questions in the questionnaire. Clients should also be aware that FlexAdvisor does not utilize the entirety of all information provided in the questionnaire nor does it consider additional information about the client not covered in the questionnaire. Although, FlexAdvisor is responsible for maintaining the Algorithm, FlexAdvisor does not override the Algorithm to provide specific recommendations to any client. While FlexAdvisor encourages clients to follow our recommendations, clients are not required to follow all recommendations. Clients are responsible for any decision to invest by utilizing any investment strategy available through our website or mobile application. Additionally, clients may cause the Algorithm to generate new recommendations at any time by changing the answers they provide through the questionnaire. The implementation of investment strategies within the website or application that do not coincide with the recommended strategies may be subject to certain restrictions in the implementation. Clients who implement an investment decision that is outside the scope of any recommendation should understand that such decision may not be suitable and that their portfolio may perform worse over any time horizon than a portfolio built according to any recommendation or any other investment strategy. FlexAdvisor encourages clients to carefully review and consider the information available in our website and application about our recommended portfolios, including but not limited to fact sheets, ETF prospectus, and any available public company filing or reports before making any investment decision.

Our portfolios will consist mainly of single stock equities. FlexAdvisor's reserves the right to change, from time to time, in its sole discretion and without prior notice to clients the number of investments it deems appropriate to address clients' investment needs and available investments.

D. Wrap Fee Program

A Wrap Fee Program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. We sponsor a Wrap Fee Program to clients that open brokerage accounts at our affiliated broker dealer, FlexInvest Securities. For Wrap Fee Participants, we will wrap third party fees (i.e., custodian fees, brokerage fees, transaction fees, etc.) in one single fee. For additional details regarding the Wrap Fee Program please refer to FlexAdvisor's Form ADV Part 2A Appendix 1, Wrap Fee Program Brochure.

Non-Wrap Fee Participants, please refer to Item 5. Fees and Compensation for a full description of our fees.

E. Assets Under Management

As of December 2019, we do not have assets under management.

Item 5 - Fees and Compensation

FlexAdvisor will charge a fixed fee of \$10 per month to Non- Wrap Fee Participants. Non- Wrap Fee Participants are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by FlexAdvisor. Non Wrap Fee Participants will receive an invoice at the end of each month. Billing cycle will stop the month following the termination. Therefore, the client will receive an invoice i/a/o \$10 even if the account was terminated before the end of the month. Fees will be due and payable to us within five (5) days of receipt. Fees are usually non-negotiable at the discretion of the Firm.

In addition to the \$10 monthly fee, clients will be charged 30 bps for the purchase of the FlexAdvisor Created Portfolios and/or Institutional Partners's Portfolios. It is possible that our Institutional Partners will share with FlexAdvisor a percentage of the fee charged to the clients for the purchase of the Institutional Portfolios. FlexAdvisor will also charge \$2 for paper confirmations and \$5 for paper statements.

Neither FlexAdvisor nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Neither FlexAdvisor nor any supervised persons accept fees based on a share of the capital gains or capital appreciation of the assets of a client (so-called performance-based fees). Our compensation structure is discussed in detail in Item 5 above.

Item 7 - Type of Clients

We will provide investment advisory services to individual investors who are United States ("US") citizens, legal US residents or non-resident aliens with eligible visa types, all of which must have a social security number and maintain a checking account with a US bank. We will also provide services to non-US persons.

We do not impose a minimum account size.

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

FlexAdvisor uses a proprietary process to help select the single stocks in the recommended

portfolios. As part of the process, we analyze securities' performance using historical market data, risk metrics and other benchmarks. Based on such analysis and clients' investment objectives, FlexAdvisor will select the list of recommended portfolios that will be available through the website and the mobile application.

A. Investment Strategies

FlexAdvisor favors long term trading but may resort to short term trading if required by particular circumstances. Our portfolios consist mainly of Single Stocks that are considered suitable and recommended to each client depending on each client's risk profile, investment objectives and time horizon through the website and the application. From time to time, FlexAdvisor will update the investments available in the online platform. An investment can be added, removed, or replaced. When an investment is removed or replaced, it will no longer be available for investment and all positions will be liquidated to cash for reinvestment. Replaced or removed investments will be replaced with similar investments. FlexAdvisors, at its sole discretion, may also reclassify investments if such investments are considered unsuitable to clients.

B. Risks of Loss

FlexAdvisor assigns a risk classification for each of the portfolios in the platform. The system will generate a pop-up window warning clients that elect to buy a portfolio outside of the his or her risk profile. For example, a client considered conservative that elects an aggressive portfolio. Nevertheless, clients have sole discretion in electing their portfolios, and will be allowed to override the pop-up window.

FlexAdvisor also includes ETFs in the recommended portfolios. ETFs themselves are managed by the relevant fund manager. FlexAdvisor does not manage, control or receive compensation from ETF managers.

Investing in securities involves a risk of loss that as a client, should be prepared to bear.

C. ETF Securities Risks

ETFs are managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark, certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and supply and demand in the market for either the ETF and for the securities

held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF.

While ETFs generally provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage to a significant degree, or concentrate in a particular type of security rather than balancing the fund with different types of securities. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

D. Investment Risk Disclosures

The risks below are disclosed in a good faith effort to inform current and prospective clients of issues that could adversely affect the value of a portfolio. The disclosure below does not attempt to convey that the risks disclosed are the only risks present when investing. Future circumstances may present additional risks to any investment portfolio. There are inherent risks involved for each investment strategy or method of analysis. Investing in securities involves risk of loss, which clients should be prepared to bear.

Market Risk: Our clients are subject to market risks that will affect the value of their portfolios, including adverse issuer, political, regulatory, market or economic developments, as well as developments that have an impact on specific economic sectors, industries or segments of the market.

Investment Style or Class Risk: Specific types of investments and investment classes tend to go through cycles of doing better, or worse, than the stock market in general. These periods have, in the past, lasted for as long as several years.

Growth Risk: The risk of the lack of earnings increase or lack of dividend yield.

Mid-Cap Company Risk: Mid-Cap companies may have narrower commercial markets, less liquidity and less financial resources than Large-Cap companies.

Small-Cap Company Risk: Small-Cap companies may have narrower commercial markets, less liquidity and less financial resources than Mid-Cap or Large-Cap companies.

Sector Risk: The risk of holding an investment in similar businesses or a single investment class, which could all be affected by the same economic or market conditions.

High-Yield Risk: The risk that results from investments in below investment grade bonds, which have a greater risk of loss of money, are susceptible to rising interest rates, and have greater volatility.

Fixed Income Risk: This risk arises if an issuer of a fixed income security is unable to meet its financial obligations or goes bankrupt.

Interest Rate Risk: Investments may be adversely affected by changes in global interest rates.

Foreign Security Risk: The risk of instability in currency exchange rates, political unrest, economic conditions, or foreign law changes.

Emerging Markets Risk: Investing in emerging markets has great political uncertainty, dependence on foreign aid, and a limited number of buyers.

Concentration Risk: Concentration risk results from maintaining exposure to issuers conducting business in a specific industry or related to a specific investment theme. The risk of concentrating investments in a particular industry or tied to a specific theme is that a portion of the client's portfolio will be more susceptible to the risks associated with that industry or theme.

Credit Risk: Credit risk is the risk that an issuer or guarantor of a security or counterparty to a financial instrument may default on its payment obligations or experience a decline in credit quality.

Debt Instrument Risk: Debt instruments may have varying levels of sensitivity to changes in interest rates, credit risk and other factors affecting debt securities. Typically, the value of outstanding debt instruments falls when interest rates rise. The value of debt instruments with longer maturities may fluctuate more in response to interest rate changes than those of instruments with shorter maturities.

Geographic Concentration Risk: Investments in a particular geographic region may be particularly susceptible to political, diplomatic or economic conditions and regulatory requirements. Thus, investments that focus in a particular geographic region may be more volatile than a more geographically diversified fund.

Technology and Regulatory Risk: FlexAdvisor uses technology to disseminate information and communicate with clients. Technical problems either with FlexInvest Securities or with any of the third party technology providers that FlexAdvisor uses, could result in an inability to disseminate information or communicate with clients.

Item 9 – Disciplinary Information

We do not have any legal, financial or other “disciplinary” item to report. We are obligated to disclose any disciplinary event that would be material to clients when evaluating us to initiate a client / Adviser relationship, or to continue a client /Adviser relationship with us.

Item 10- Other Financial Industry Activities and Affiliations

We are not, nor any of our management persons registered, or have an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor or as an associated person (or registered representative) of the foregoing entities, except as noted below.

FlexInvest Securities LLC d/b/a GWM Group Inc. is an affiliate of with FlexAdvisor due to common control. Jose Carlos Gonzalez is the sole owner of both entities. FlexInvest Securities is a registered broker-dealer member of FINRA and SIPC that will provide brokerage services to FlexAdvisor's clients that participate in the firm's Wrap Fee Program. For additional details please refer to the firm's Form ADV Part 2A Appendix 1, Wrap Fee Program Brochure. In addition, Jhonny Paul Alcivar Romero, our Chief Compliance Officer is also the Chief Compliance Officer of GWM Group, Inc.

FlexInvest Inc. is affiliated to FlexAdvisor due to common control. Jose Carlos Gonzalez is the sole owner of both entities. FlexInvest Inc. provides support services to FlexAdvisor per an intercompany agreement. These services may include brokerage services, customer technical support, marketing functions, operational support, and other administrative services.

The following three entities are affiliated to FlexAdvisor due to common control but their businesses are completely independent from FlexAdvisor's and/or FlexInvest Securities business.

GWM Ltd. is affiliated to FlexAdvisor due to common control. Jose Carlos Gonzalez owns both entities and serves as Chairman and Director of GWM LTD.

Flexfunds Holdings LLC. is affiliated to FlexAdvisor due to common control. Jose Carlos Gonzalez owns 75% of Flexfunds Holdings LLC. and 100% of FlexAdvisor LLC. Jose Carlos Gonzalez serves as Director of Flexfunds.

Leverage Shares Management Co. is affiliated to FlexAdvisor due to common control. Jose Carlos Gonzalez owns 100% of both entities.

Item 11 - Code of Ethics, Participation or Interest in client Transactions and Personal Trading

A. Code of Ethics.

Under the Investment Advisers Act of 1940, FlexAdvisor has adopted and implemented a

written Code of Ethics that is tailored to our activities and covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.

The Rules are designed to ensure that our personnel (i) observe applicable legal (including compliance with applicable state and federal securities laws) and ethical standards in the performance of their duties; (ii) at all times place the interests of our clients first; (iii) disclose all actual or potential conflicts; (iv) adhere to the highest standards of loyalty, candor and care in all matters relating to its clients; (v) conduct all personal trading consistent with the Rules and in such a manner as to avoid any actual or potential conflict of interest or any abuse of their position of trust and responsibility; and (vi) not use any material non-public information in securities trading. The Rules also establish policies regarding other matters such as outside employment, the giving or receiving of gifts, and safeguarding portfolio holdings information.

Under the general prohibitions of the Rules, our personnel may not: 1) effect securities transactions while in the possession of material, non-public information; 2) disclose such information to others; 3) participate in fraudulent conduct involving securities held or to be acquired by any client; and 4) engage in frequent trading activities that create or may create a conflict of interest, limit their ability to perform their job duties, or violate any provision of the Rules.

A. Participation or Interest in client Transactions.

Our personnel are required to conduct their personal investment activities in a manner that we believe is not detrimental to our advisory clients. Our personnel are not permitted to transact in securities except under circumstances specified in the Code of Ethics.

A conflict of interest is presented when employees and representatives may employ the same strategies for their personal investment accounts as the website and the application does for clients. However our policy requires all Access Persons² to report all personal transactions in securities not otherwise exempt under the policy. All reportable transactions are reviewed for compliance with the Code of Ethics.

In addition, FlexAdvisor's employees and representatives may have accounts at FlexInvest Securities. However, FlexAdvisor's policy requires that any employee or related person's

2 Access person means any of your supervised persons who has access to nonpublic information regarding any clients' purchase or sale of securities, or nonpublic information regarding the portfolio holdings of any reportable fund, or who is involved in making securities recommendations to clients, or who has access to such recommendations that are nonpublic. If providing investment advice is your primary business, all of your directors, officers and partners are presumed to be access persons.

account be treated in the same manner as any other unaffiliated account.

We do not, nor a related person recommend, to you, or buy or sell for your accounts, securities in which we (or a related person) have a material financial interest.

B. Personal Trading

From time to time, FlexAdvisor may recommend securities to clients that FlexAdvisor has purchased for its own accounts. However, FlexAdvisor has established restrictions in order to ensure its fiduciary responsibilities are met. Under our Code of Ethics, the decision to purchase securities for FlexAdvisor portfolios must never be substantially derived, in whole or in part, from the role of a supervised person, unless the information is also available to the investing public on reasonable inquiry. FlexAdvisor will never engage in trading that operates to the client's disadvantage.

We do not execute transactions on a principal or agency cross basis.

The Ethics Rules are available to you and prospective clients upon request. In the event that you request a copy of our Code of Ethics, we will furnish to you a copy within a reasonable period of time at your current address of record.

Item 12 - Brokerage Practices

FlexAdvisor clients will direct and be solely responsible for the direction of investments using the brokerage firm where clients hold their account.

FlexAdvisor has an incentive in promoting clients participation in the Wrap Fee Program (clients are required to open an account at FlexInvest Securities) over the Non-Wrap Fee option (clients implement the investment strategies through their own brokerage firms). However, this conflict is mitigated because:

1. The algorithm automatically generates the investment recommendations that are based on the answers to the questionnaire.
2. The algorithm does not differentiate between Wrap Fee Participants and Non-Wrap Fee participants.

Except for referrals to the Wrap Fee Program, FlexAdvisor does not have any other agreements to refer clients to any specific broker dealer or and does not receive compensation for client referrals or does not have any soft dollar arrangements in place.

Item 13- Review of Accounts

Our Chief Compliance Officer will conduct at least an annual review of client's risk profiles, investment objectives and time horizon. FlexAdvisor encourages clients to compare detailed

statements showing the holdings and market value in the account as well as the transaction activity, interest and dividends for the reporting period. However, because clients implement the investment strategy themselves through their own brokerage firms, they are ultimately responsible for the implementation of the recommendations available in the platform.

Item 14 – Client Referrals and Other Compensation

FlexInvest has a referral program that consists of a monetary incentive to join and/or promote the opening of accounts at FlexInvest Securities. Under this referral program, the existing client will receive a monetary incentive for every referred client that opens a FlexInvest Securities account. The existing FlexInvest client can easily refer people by inviting them to join with a unique referral code that we can track to the client that issued the invite. Once the person that they referred opens an account and inputs their friends' referral code in the onboarding process, they both will receive a monetary incentive usually ranging between \$5 and \$20 USD. The incentive is deposited directly into their FlexInvest Securities account.

Example: Roger is an existing FlexInvest client that wants to invite his friends. He send out an invite with his unique referral code to his friends. His friend Rachel receives his invite via email or text, inviting her to open a FlexInvest Securities account. Once Rachel opens her account, then \$5 USD (or whatever the running promotion is that month) is deposited into the clients' accounts within three business days.

Item 15 – Custody

We do not have custody of client funds or securities. Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. FlexAdvisor encourages clients to compare statements received from their custodian with information from our website or mobile application to confirm their individual performance results and to contact FlexAdvisor if they find any inaccurate information.

Item 16 – Investment Discretion

We do not accept discretionary authority to manage securities accounts on clients' behalf. Specifically we do not have discretionary authority to determine which securities to buy or sell on clients' behalf, determine the amount of securities to be bought or sold on clients' behalf, the broker or dealer in which to execute such securities transactions, and determine what transaction fee rate shall be paid on clients' behalf. The transactions fees set forth by the client's brokerage firm, and FlexAdvisor do not affect or influence in any way the amounts they charge.

Item 17. Voting Client Securities

We do not have, nor will we accept authorization to vote client securities. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent. Clients should contact their custodian or a transfer agent with questions about a particular solicitation.

Item 18 - Financial Information

We have no financial condition that is reasonably likely to impair our ability to meet We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients given that we do not have discretionary authority or custody of client funds or securities. In addition, we are not currently, nor at any time in the past ten years been the subject of a bankruptcy petition. FlexAdvisor does not solicit fees of more than \$1,200.00, per client, six months or more in advance and therefore does not need to include a balance sheet with this Brochure.